TSD File Inventory Index

Date: October 25,2001
Initial: Officerers

Facility Name: Composite at Atres,	Jne.	(One Fel der Site)	
Facility Identification Number: OHD D9		30 979	
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status	1	.1 Correspondence	
.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment		C.1 Compliance - (Inspection Reports)	V
.3 Part A Application and Amendments	l \	C.2 Compliance/Enforcement	V
4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	1
.1 Correspondence		1 RFA Correspondence	
.2 Reports		2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	-
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total -1

TANK TO THE PARTY OF THE PARTY	
.5 RFI QAPP	.7 Lab data, Soil Sampling/Groundwater
.6 RFI QAPP Correspondence	.8 Progress Reports
.7 Lab Data, Soil-Sampling/Groundwater	D.5 Corrective Action/Enforcement
.8 RFI Progress Reports	.1 Administrative Record 3008(h) Order
.9 Interim Measures Correspondence	.2 Other Non-AR Documents
.10 Interim Measures Workplan and Reports	D.6 Environmental Indicator Determinations
D.3 Corrective Action/Remediation Study	.1 Forms/Checklists
.1 CMS Correspondence	E. Boilers and Industrial Furnaces (BIF)
.2 Interim Measures	.1 Correspondence
.3 CMS Workplan	.2 Reports
.4 CMS Draft/Final Report	F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)
.5 Stabilization	G.1 Risk Assessment
.6 CMS Progress Reports	.1 Human/Ecological Assessment
.7 Lab Data, Soil-Sampling/Groundwater	.2 Compliance and Enforcement
D.4 Corrective Action Remediation Implementation	.3 Enforcement Confidential
.1 CMI Correspondence	.4 Ecological - Administrative Record
.2 CMI Workplan	.5 Permitting
.3 CMI Program Reports and Oversight	.6 Corrective Action Remediation Study
.4 CMI Draft/Final Reports	.7 Corrective Action/Remediation Implementation
.5 CMI QAPP	.8 Endangered Species Act
.6 CMI Correspondence	.9 Environmental Justice
N. Company of the com	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify induities felder published

A.1 Public
Participation

	Westefer 886- PUBLIC VOUC	-7450 H <mark>ER FOR ADVERTIS</mark>	NG	For Agency Use Only
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Standard Form No. 1143

ADVERTISING ORDER

51840NALX ORDER NUMBER

DEPARTMENT OR ESTABLISHMENT, BURL OR OFFICE

U.S. Environmental Protection Agency Region V Waste Mgmt. Div.

8/14/1984

The publisher of the publication named below is authorized to publish the enclosed advertisement according to the schedule

charged to private individuals with the usual discounts. It is to be

below provided the rates are not in excess of the commercial rates

set solid, without paragraphing, and without any display in the heading unless otherwise expressly authorized in the specifications.

NAME OF THE PUBLICATION ADVERTISED IN

Columbus Dispatch SUBJECT OF ADVERTISEMENT

EDITION OF PAPER ADVERTISEMENT APPEARED

Friday August 24, 1984

Public Notice NUMBER OF TIMES ADVERTISEMENT APPEARED

DATE(S) ADVERTISEMENT APPEARED

One Time Only SPECIFICATIONS FOR ADVERTISEMENT <u>August 24. 1984</u>

Place as Legal Notice

Affidavit Required

COPY FOR ADVERTISEMENT

Please see attached Public Notice (2 pages)

AUTHORITY TO ADVERTISE	INSTRUMENT OF ASSIGNMENT		
NUMBER 51840NALX	NUMBER		
August 16, 1984	DATE		
SIGNATURE OF AUTHORIZING OFFICIAL	TITLE		
INSTRUCT	TIONS TO PURITSHERS		

Extreme care should be exercised to insure that the specifications for advertising to be set other than solid be definite, clear, and specific since no allowance will be made for paragraphing or for display or leaded or prominent headings, unless specifically ordered, or for additional space required by the use of type other than that specified. Specifications for advertising other than solid and the advertisement copy submitted to the publisher will be attached to the voucher. The following is a sample of solid line advertisement set up in accordance with the usual Government requirements.

> DEPARTMENT OF HIGHWAYS & TRAFFIC, DEPARTMENT OF HIGHWAYS & TRAFFIC D.C. Bids are requested for first spring 1966 cement concrete repair contract, including incidental work, Washington, D.C., Invitation No. C-5576-H, consisting of 11,090 sq. yds. PCC Class BB sidewalk repair and 2,000 cu. yds. PCC Class A pavement, alley, & driveway repair, both cut repairs only. Bidding material available from the Procurement Officer, D.C. Scaled bids to be opened in the Procurement Office at 3:00 p.m., November 15, 1965. November 15, 1965.

Your bill for this advertising order should be submitted on the "Public Voucher for Advertising" form, which is printed on the reverse of this form, immediately after the last publication of the advertisement. If copies of the printed advertisement are not available, complete the affidavit provided on the voucher. Submit the voucher and a copy of the printed advertisement to United States Environmental Protection Agency Financial Operations Section 5MF-14 230 South Dearborn Street Chicago, Illinois 60604 **IMPORTANT**

Charges for advertising when a cut, matrix, stereotype or electrotype is furnished will be based on actual space used and no allowance will be made for shrinkage.

In no case shall the advertisement extend beyond the date and edition stated in this order. آرة أدمة م

The U.S. Environmental Protection Agency (U.S. EPA) has received a certification of change in status from the following two facilities:

Eton-Colby Chemical Company, 620 N. Cassady Ave., Columbus, Ohio Columbus Products Company, 300 Phillipi Road, Columbus, Ohio

These facilities were storing waste considered hazardous under Federal law. This action will change the status of these facilities from storage facilities storing for more than 90 days to generators storing for fewer than 90 days (per 40 CFR 262.34). The status change for these facilities was effected by removing all hazardous waste stored for longer than 90 days, and by limiting the present accumulation period to fewer than 90 days.

The certifications of change in status were submitted to qualify for generator only status under the Resource Conservation and Recovery Act of 1976, as amended. U.S. EPA requires such certifications when facilities request a change in status from storage facilities to generators.

The certifications and related background materials are available to the public at U.S. EPA Waste Management Branch, 230 S. Dearborn, 13th Floor, Chicago, Illinois, (312) 886-7450, from 8:30 a.m. to 4:30 p.m. Monday through Friday. These materials may also be seen at the Ohio Environmental Protection Agency - Central District Office, 2244-46 S. Hamilton Rd., Columbus, Ohio, (614) 466-6450, during regular business hours.

Public comments concerning any of these two changes in status are requested by U.S. EPA and must be postmarked on or before September 24, 1984. Please send comments to:

United States Environmental Protection Agency Region V RCRA Activities P.O. Box A3587 Chicago, Illinois 60690

Attention: Gary M. Westefer

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United States Environmental Protection Agency Region V RCRA Activities P.O. Box A3587 Chicago, Illinois 60690

Attention: Gary M. Westefer

A.2 Part A/ Interim Status

CERTIFICATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

FACILITY NAME:	Columbus Pr	oducts Company	A (\/	
EPA I.D. NUMBER:	OHD 0950309	79	MY	
LOCATION CITY:	Columbus		V	
STATE:	Ohio	-		
1. Are there any o closed) at your CURRENTLY SHOWN	f the following s facility? NOTE - IN YOUR PART A A	- DO NOT INCLUDE	agement units (E HAZARDOUS WAS	existing or TE UNITS
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would be conside RCRA. Also incl disposed of and of each unit and	es" answers to an ption of the was In particular, ered as hazardous ude any available the dates of distinctude capacitulan if available	tes that were s please focus o wastes or haza e data on quant posal. Please y, dimensions a	tored, treated on whether or n irdous constitu ities or volum also provide a	or disposed ot the waste ents under e of wastes description
75 GPM, consist approximately 2 water. Location is generated at the transported	a pickling oper s of four proces 000 gal. capacit n is at southeas a rate of appro off side to a TS ary 24, 1986. N	sing tanks and y. Removes nic t corner of fac ximately 1 cu. D facility. Th	clarifier each kel from proce tory building. ft. per day an his unit was pl	ess waste- Sludge ad shall

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

in your Part A application, please of about the environment that may have occurring.	ve and also those hazardous waste units describe for each unit any data avail- es of hazardous wastes or constituents curred in the past or may still be
Please provide the following informa	
a. Date of release	
D. Type of wasta malan.	
	ased
 Describe nature of release (i.e. or tank, etc.) 	, spill, overflow, ruptured pipe
None	
4. In regard to the prior or continuing please provide (for each unit) any and which would describe the nature and extra exists as a result of such release hazardous wastes or constituents present	releases described in Number 3 above, alytical data that may be available stent of environmental contamination ses. Please focus on concentrations of ent in contaminated soil or groundwater
I certify under penalty of law that this prepared under my direction or supervised designed to assure that qualified persons the information submitted. Based on my who manage the system, or those persons the information, the submittal is, to the true, accurate, and complete. I am awaties for submitting false information, and imprisonment for knowing violations 40 CFR 270.11(d))	inquiry of the person or persons directly responsible for gathering he best of my knowledge and belief, re that there are significant.
W. F. Frey, President	
Typed Name and Title	
Mh fter	March 4, 1986
Signature	Date



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

10 FM

REPLY TO THE ATTENTION OF:

HRE-8J

October 23, 1992

Mr. Al Bell Consolidated Stores, Inc. 300 Phillipi Road Columbus, OH 43228-1310

Re:

Visual Site Inspection
Consolidated Stores, Inc.

(formerly Columbus Products, Inc.)

Columbus, OH

ID No. OHD 095 030 979

Dear Mr. Bell:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for November 3, 1992, at 10:00 a.m. The inspection team will consist of Pete Zelinskas and Chris Cappel of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

Mr. Bell October 23, 1992 Page 2

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Kevin M. Pierard, Chief

OH/MN Technical Enforcement Section

Enclosure

cc:

Ed Lim, OEPA Central Office Steve Rath, OEPA Central District Office

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

- 1. Two copies of a detailed map of the facility
- 2. Facility history, including dates of operation, ownership changes, and production processes
- 3. Current facility operations
- 4. Processes that generate waste that is treated, stored, or disposed of at the facility
- 5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
- 6. Security at the facility
- 7. Information regarding geology and the uses of ground water and surface water in the area
- 8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
- 9. Records of any spills that may have occurred at the facility
- 10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU



UNITED STATES ENVIRONMENTAL PROTECTION AGENC.

REGION V 230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: 5HW-13

AUG 4 1983

H. A. Almy, Director
Factory Engineering and Services
Columbus Products Company
300 Phillipi Road
Columbus, Ohio 43228

RE: Permit Application Withdrawal Letter

FACILITY NAME: Columbus Products Company

U.S. EPA ID NO.: OHD 095 030 979

Dear Mr. Almy:

This is to acknowledge receipt of your letter of June 10, 1983, requesting the withdrawal of your Part A Hazardous Waste Permit Application. Your request was not signed and certified by an authorized person, in accordance with 40 CFR Part 270.11 (enclosed). Please resubmit your request with the correct signature and certification, so that your withdrawal can be processed. Your request must contain a detailed explanation why the application should be withdrawn. Also, if at any time, since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found in 40 CFR Part 265 Subpart G (enclosed).

If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly we will continue to process your application.

Please feel free to contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance, if you have any questions. Please refer to "Permit Application Withdrawal Letter," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Enclosure

cc: G. F. Diekman, President
Richard Huntington, Senior Manufacturing Engineer

ONITED STATES TO NOTICE OF A PROTECTION OF A P

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF: RCRA ACTIVITIES

MAY 27 1982

Richard Huntington, Sr. Mfg. Engr. Columbus Products Company 300 Phillipi Road Columbus, Ohio 43228

RE: Interim Status Acknowledgement USEPA ID No. OHD095030979

FACILITY NAME: Columbus Products, Company

Dear Mr. Huntington:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for Interim Status. Our opinion will be reevaluated on the basis of this information.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265, or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from your Part A Permit application. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR Part 122.23; your facility may operate under interim status until such time as a permit is issued or denied. This will be preceded by a request from this office or the State (if authorized) for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Enclosure cc: G.F. Diekmann, President

P.F. Salipante

FACILITY NAME

COLUMBUS PRODUCTS COMPANY

EPA ID NUMBER OHD095030979

FACILITY OPERATOR
COLUMBUS PRODUCTS CO

FACILITY OWNER
WHITE CONSOLIDATED INDUSTRIES

FACILITY LOCATION
300 PHILLIPI RD
COLUMBUS

OH 43228

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
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and the fifth and half and and the			*	METRIC TONS\HOUR	W
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LANDFILL	D80	A OR F	*	LITERS\HOUR	H
LAND APPLICATION	D81	B OR Q	-36	ACRE-FEET	A
OCEAN DISPOSAL	DS2	U OR V	*	HECTARE-METER	F
SURFACE IMPOUNDMENT	D83	G OR L	-16-	ACRES	В
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ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER	•	OHD095030979	REACKNOWLE	DGEMENT
		COLUMBUS PRODUCTS 300 PHILLIPI RD COLUMBUS	COMPANY	43228
INSTALLATION ADDRESS		300 PHILLIPI RD	НО	43228
EPA Form 8700-128 (4-80)	<u> </u>	00/20/81	***	

X A. FIRST NOTIFICATION

B. SUBSEQUENT NOTIFICATION (complete item C)

AUG1 5 1980

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

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IX. DESCRIPTION OF HA	ZARDOUS WAST	ES (continued from)	front)		
A. HAZARDOUS WASTES FR waste from non—specific so	ROM NON—SPECIFIC urces your installation	SOURCES. Enter the handles. Use additional	four—digit number from I sheets if necessary.	1 40 CFR Part 261.31 for	r each listed hazardous
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B, HAZARDOUS WASTES FR	23 - 26 ROM SPECIFIC SOUR	CES. Enter the four-d	igit number from 40 CF	FR Part 261.32 for each I	isted hazardous waste from
specific industrial sources yo			if necessary. (D0	NOT HAVE 40 CF	R LIST)
13 K 0 6 2	14	15	16	17	18
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23 - 26	23 • 26	23 - 26	23 - 26	23 - 26	30
	23 - 26				
C. COMMERCIAL CHEMICAL stance your installation han	L PRODUCT HAZAR	DOUS WASTES. Enter lazardous waste. Use ad	the four—digit number ditional sheets if necess	from 40 CFR Part 261.3	3 for each chemical sub-
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		23 - 26	03 0 26	26	22 26
D. LISTED INFECTIOUS WA hospitals, medical and resea	STES. Enter the four	-digit number from 40	CFR Part 261.34 for ea e additional sheets if ne	ch listed hazardous waste	e from hospitals, veterinary
23 - 26	23 - 26	23 • 26	52	53	23 - 26
E. CHARACTERISTICS OF N hazardous wastes your insta	ION-LISTED HAZAI Illation handles. <i>(See</i>	RDOUS WASTES. Mark 40 CFR Parts 261.21 —	"X" in the boxes corre 261.24.)	esponding to the characte	eristics of non-listed
☐1. IGNITABL		2. CORROSIVE	□3. REA (D003)	CTIVE	☐4. TOXIC (D000)
X. CERTIFICATION					
I certify under penalty of attached documents, and I believe that the submit mitting false information,	that based on my ted information is	inquiry of those ind true, accurate, and c	lividuals immediately omplete. I am aware	responsible for obta	ining the information,
Reshord 4 /	lentinglon	Richa	rcial Title (type or rd L. Huntingt anufacturing E	con /	DATE SIGNED
EPA Form 8700-12 (6-80) Ri	FVERSE				

EPA Form 8700-12 (6-80)

Please go to the reverse of this form and provide the requested information.

JUL 31 1980

CONTINUE ON REVERSE

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Hazardous Waste Activity Status

U.S. EPA I.D. No OHD095030979 6 TSD-3 9 Ohio Permit No.

01-25-0505

April 1,1985

M.A. Almy Factory Eng. & Serv. Director Columbus Products Company 300 Phillipi Rd. Columbus, Ohio 43228

Dear H.A. Almy,

According to our records, your Ohio Hazardous Waste Installation & Operation Permit has expired. Prior to the expiration of that permit, you had informed and certified to the Ohio EPA that you no longer conducted hazardous waste activity for which a permit was required.

Therefore, this letter is to inform you that, based on the information you had submitted and an investigation by Agency staff, you will maintain the status of a generator only with less than 90 day storage.

You should continue to use the identification number assigned to you by the U.S. EPA for purposes of compliance with the Ohio EPA manifest, recordkeeping and reporting requirements for generators and transporters of hazardous waste as appropriate.

Should you have any questions concerning your current status, please contact the appropriate Ohio EPA District Office (see enclosed list).

Very truly yours.

Thomas E. Crepeau, Manager

Thomas & Crepeau

Data Management Section

Division of Solid and Hazardous Waste Management

TEC/ds

Enclosure

cc: U.S. EPA, Region V

HWFB

D.O.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

DATE: September 27, 1984

SUBJECT: Changes in Status, State of Ohio

FROM: Gary M. Westefer Sw

TO: Becky Strom STU#2

The following are the closing dates for the Changes in Status for the State of Ohio. No comments have been received on the closures as of this date.

Eton-Colby Chemical Company, Columbus, September 24, 1984 Columbus Products Company, Columbus, September 24, 1984 Toledo- Edison Company:

Acme Generating Station, Toledo
Bay Shore Generating Station, Oregon
Delaware Operations Center, Toledo
Davis -Besse Nuclear Power Station, Oak Harbor

All four facilities close September 24, 1984

Airmatic Allied, Inc., Wilmington, September 26, 1984
Inmont Corporation, Cincinnati, September 26, 1984
Carboline Company, Xenia, September 26, 1984
GMC-Fisher Body, Fairfield, September 26, 1984
GMC-Delco Products, Dayton, September 26, 1984
Fram Corporation, Greenville, September 26, 1984
Procter & Gamble Co., Cincinnati, September 26, 1984
Inmont Corporation, Greenville, September 26, 1984
Radium Petroleum co., Cincinnati September 26, 1984

G. F. Diekmann, President Columbus Products Company 300 Phillipi Road Columbus, Ohio 43228

1

RE: Withdrawal of Part A

FACILITY NAME: Columbus Products Company

U.S. EPA ID #: OHD 095-030-979

Dear Mr. Diekmann:

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a generator storing less than 90 days. This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you purpose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 886-6194, for assistance.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief Waste Management Branch

cc: Tom Carlisle, Ohio EPA
 Cheryl Kaiser, Ohio EPA
 Richard E. Hill, Columbus Products Co.
 P. F. Salipante, Columbus Products Co.
 Richard L. Huntington, Columbus Products Co.

bcc: Lisa Pierard Part A File Rebecca Strom

5HW-13:RStrom:PGrace:9-11-84

INITIALS

AUTHOR Sold

STU #1 CHIEF STU #2 STU # CHIEF

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ATTES OF THE PERSON OF THE PER

WIND DIRECTO

Columbus Products Company

300 Phillipi Road Columbus, Ohio 43228 614/272-4000

August 16, 1983



Karl J. Klepitsch, Jr., Chief Waste Management Branch (5HW-13) United States Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

RECEIVED
AUG 26 1983

WASTE MANAGEMENT BRANCH

Subject: Permit Application Withdrawal Letter

Dear Mr. Klepitsch:

OHD 095 030979, PA, G, TSD, PASNONG

Columbus Products Company (EPA ID No. OHD 095 030 979) requests that this be removed from your lists of hazardous waste treatment storage and disposal facilities for the following reasons:

- 1. In November of 1980 paint wastes were scheduled to become listed hazardous wastes in January 1981. In our production process paint waste overspray must be periodically removed from our conveyor hooks. This process of burning paint off of the hooks meets the definition of treatment, therefore, if the paint is hazardous the unit requires a hazardous waste incinerator permit. As you are aware, this listing of paint waste has since been indefinitely postponed. For this reason, and the reason that this waste does not possess the characteristics of hazardous waste, we do not have a hazardous waste incinerator as we had once feared.
- 2. Our filing of an interim permit application as a storage facility was done as a cost reduction matter in that, since we generate such low quantities of hazardous waste, removal within ninety days would mean that we would pay premium on transporting half empty trucks. However, we found when the Part B requirements were issued that the administrative burdens of such a storage facility exceeded the savings from moving only full trucks. Accordingly we have shipped all drums from our facility.
- 3. Columbus Products Company's closure plan for its hazardous waste storage facility is as follows:
 - A. Upon determination that the facility will no longer continue to store wastes beyond ninety days all waste barrels will be shipped to a licensed hazardous waste treatment storage and/or disposal facility. Since all spills and residues are cleaned up immediately, placed into drums and henceforth considered as hazardous waste, no special efforts are necessary for decontamination of equipment pursuant to 40CFR265.114.



Subject: Permit Application Withdrawal Letter (cont'd.)

4. We certify that Columbus Products Company has closed its hazardous waste storage facility according to its closure plan. Enclosed are the manifests attesting to the shipment of all stored wastes via a licensed waste hauler to a licensed disposal facility.

If you need further information please contact H. A. Almy at 614-272-4335.

Sincerely,

G. F. Diekmann President

Richard E. Hill, P.E. Environmental Engineer

/pm

Enclosures

cc: Thomas E. Crepeau, Manager Permits & Manifest Records Section Division of Hazardous Materials Management Ohio EPA

Columbus Products Company

300 Phillipi Road Columbus, Ohio 43228 614/272-4000

June 10, 1983



U.S. Environmental Protection Agency Region V 230 South Dearborn Street Chicago, Illinois 60604

OHD 095 030 979 PA, G, TSD, PAS)

Attention Mr. William Miner, Chief
Technical, Permits, and Compliance Section

Dear Sir:

In August 1982, Columbus Products Company notified the State of Ohio EPA that we will not store hazardous waste for more then 90 days and therefore requested cancellation of our TSD Permit Number 01-25-0505.

Region V was also to be notified, but evidently was not. I am attaching a copy of the letter sent to the State of Ohio and am requesting that you take similar action. This was discussed with Charles B. Slaustas of your staff, today.

If any further questions develop, please contact me at your convenience.

Sincerely,

H. A. Almy, Director

Factory Engineering & Services

/pm

Attachment

cc: Mr. R. E. Hill





Columbus Products Company

300 Phillipi Road Columbus, Ohio 43228 614/272-4000

August 25, 1982

Mr. Thomas E. Crepeau Permits & Manifest Records Section State of Ohio EPA 361 E. Broad Street Columbus, Ohio 43216

Dear Sir:

Effective immediately we will not store hazardous waste for more then 90~days, and therefore request cancellation of our TSD Permit Number 01-25-0505.

Due to a reduction in operation level only a small quantity of waste will be generated and this waste will be disposed of within 90 days.

Hazardous waste presently in storage will be disposed of within the 90 day storage period.

Sincerely,

H. A. Almy, Prector

Factory Engineering & Services

/pm

cc: Mr. R. E. Hill



Re: Franklin County
OHD095030979
HWFAB 01-25-0505



Mr. H. A. Almy, Director Factory Engineering and Services Columbus Products Company 300 Phillippi Road Columbus, Ohio 43228

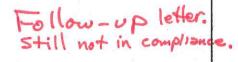
December 14, 1982

Dear Mr. Almy:

Thank you for your written response to my letter of November 9, 1982, regarding the RCRA Interim Status Inspection conducted at the Columbus Products Company. The additional information you provided concerning Placards (Page 2-2, 5c) and Container Inspection (Page 5-1, 4) should satisfactory resolve the deficiencies cited for these items in the October 25, 1982, Inspection Report. However, your response concerning Personnel Training (Page 2-2, 8,9) and Contingency Plan (Page 3-2, 1d,3) did not satisfy Interim Status Hazardous Waste Regulations.

Federal/State Interim Status Hazardous Waste Regulations promulgated under the Resource Conservation and Recovery Act require that generators of hazardous waste have a training program which instructs facility personnel in Hazardous Waste Management Procedures. Generators of hazardous waste must also have a Contingency Plan for their facility designed to minimize hazards to human health and the environment in the event of any unplanned sudden or non-sudden release of hazardous waste.

Before Columbus Products Company can be considered to be in compliance with Interim Status Hazardous Waste Regulations they must have developed and implemented a Personnel Training Program satisfying the requirements set forth in 40 CFR Part 265.16. The facility must also have an up to date and operational Contingency Plan satisfying the requirements of 40 CFR, Part 265, Subpart D.



Page - 2 - Franklin County OHD095030979 HWFAB 01-25-0505

Columbus Products Company must comply with the preceding two requirements by January 31, 1983, in order to avoid this matters referral to the Ohio EPA Enforcement Unit. Please respond in writing and provide this office with a copy of your Personnel Training Program by the above date.

Sincerely,

Lundy J. Adelsberger Environmental Engineer

Division of Hazardous Materials Management

Central District Office

LJA/sc

cc: Ms. Paula Cotter, Compliance Unit, DHMM, C.O.

cc: Mr. Ken Westlake, Region V, U.S. EPA

Columbus Peoducts Company
RE: Withdrawal of Part A
300 Phillipi Road Recility Name: Columbus Products Company
Columbus, OHIO 43228 U.S. EPA ID #: OHDO95030979

Dear MR. DICKMANN:

OHIO ENVIRONMENTAL PROTECTION AGENCY This Agency has been advised by the (State Agency Name) that the referenced facility is no longer operating as a (treatment, storage, disposal) facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCRA) is that of a (generator storing less than 90 days, transporter, small generator, non-regulated facility, etc.). This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you purpose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the (State Agency) at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 586-684, for assistance.

Sincerely yours,

Space Co. Richard E. Hill, P. E. Engineer

Karl J. Klepitsch, Jr., Chief Co. P. F. Salipante

Waste Management Branch

Waste Management Branch

Enclosure/Part A

- Tom Carlisle, OEPA Cheeyl Kaiser, OEPA

bee. Rebeech Strom Lish RIERARD Part A file

Please print or type in the unshaded area (fill—in areas are spaced for elite type, i	s only e., 12 characters linch).					Form Approved OMB No. 15		15 75	A Tree
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VI. FACILITY LOCATION	300 Phillipi Road must be completed regal items if no label has been the instructions for detailed tions and for the legal								lefer to descrip-
						which this data is collected,			
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A or B above? (FORM 2C) E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)			23	24 X	municipal effluent belo	ect at this facility industrial or w the lowermost stratum con- uarter mile of the well bore,	25	χ	27
G. Do you or will you inject at this	facility any produced	-X 28	29	30		drinking water? (FORM 4) ect at this facility fluids for spe-	31	32	33
water or other fluids which are in connection with conventional duction, inject fluids used for oil or natural gas, or inject fluid		Х		cial processes such as process, solution minir	mining of sulfur by the Frasch ng of minerals, in situ combus- ecovery of geothermal energy?	7 - 11-15 7	Х		
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attainment area? (FORM 5) III. NAME OF FACILITY SKIP C O L U M B U S	PRODUC				PANY	numeron of organization	43	44	45
IV. FACILITY CONTACT							69		
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C. THIRD	D. FOURTH
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15 15 - 19 VIII. OPERATOR INFORMATION	15 16 - 19
	NAME B. Is the name listed i
COLUMBUS PRODUCTS C	OMPANY item VIII-A also the
8	UMIANT UYES ⊠ NO
15 16 C. STATUS OF OPERATOR (Enter the appropriate letter i	- 55
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S = STATE O = OTHER (specify) P = PRIVATE	A 6 1 4 2 7 2 4 0 0 0
E. STREET OR P.O. BOX	
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F. CITY OR TOWN	G.STATE H. ZIP CODE IX, INDIAN LAND
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	(Air Emissions from Proposed Sources)
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C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R T.O. B.E. I.S.S.U.E.D. 9 N	A (specify)
15 16 17 11 - 30 15 16 17 11 XI. MAP	5 - 30
Attach to this application a topographic map of the area the outline of the facility, the location of each of its ex	extending to at least one mile beyond property bounderies. The map must show isting and proposed intake and discharge structures, each of its hazardous waste
treatment, storage, or disposal facilities, and each well v water bodies in the map area. See instructions for precise	where it injects fluids underground. Include all springs, rivers and other surface requirements.
XII. NATURE OF BUSINESS (provide a brief description)	17. 730
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XIII, CERTIFICATION (see instructions)	F9: A 51
XIII. CERTIFICATION (see instructions) I certify under penalty of law that I have personally example attachments and that, based on my inquiry of those papplication, I believe that the information is true, accumulation is true, accumulation.	F9: A 51 mined and am familiar with the information submitted in this application and all persons immediately responsible for obtaining the information contained in the rate and complete. I am aware that there are significant penalties for submitting
XIII. CERTIFICATION (see instructions) I certify under penalty of law that I have personally example attachments and that, based on my inquiry of those papplication, I believe that the information is true, accurately false information, including the possibility of fine and impact that the information is true, accurately the information, including the possibility of fine and impact the information.	F9: A 51 mined and am familiar with the information submitted in this application and all persons immediately responsible for obtaining the information contained in the rate and complete. I am aware that there are significant penalties for submitting
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	A, FIRST APPLICATION (place an "X" below and provide the appropriate date) [X] 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.) TO NEW FACILITY FOR NEW FACILITY									
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other can hol	d 400 gallons. The fa	cility also has an inci	nerator t	hat c	an bur	n up	to 20	gall	ons pe	er hour.
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C. SPACE FOR ADDITIONAL PROCESS CODES ON FOR DESCRIBING OTHER PROCESSES (code "TO4" /- FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

PAINT SLUDGE IS AIR DRIED IN OUTSIDE PITS TO ALLOW IT TO HARDEN AND TO INCREASE SOLIDS CONTENT FOR LANDFILL DISPOSAL.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMSK
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1.

PROCESS CODES:
For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual
- quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

				P/				UNI		D. PROCESSES				D. PROCESSES					
LINE NO.	M	VA.	ST	EN	10	B. ESTIMATED ANNUAL QUANTITY OF WASTE	5	URE enter ode)		1. PROCESS CODES (enter)			S		2. PROCESS DESCRIPTION (if a code is not entered in D(1))				
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X-2	. 1	D	0	0	2	400		P	T	0	3	L	3 (3 0)				The state of the s
X-3	3 1	D	0	0	1	100		P	T	0	3	L	8	3 0)				
X-4	1	D	0	0	2														included with above

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE	DNLY
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. DESCRIPTION OF HAZARDOUS WASTES (cont	THE PARTY AND ADDRESS OF THE PARTY AND ADDRESS	D. PROCESSES
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EPA Form 3510-3 (6-80)

A. NAME (print or type)

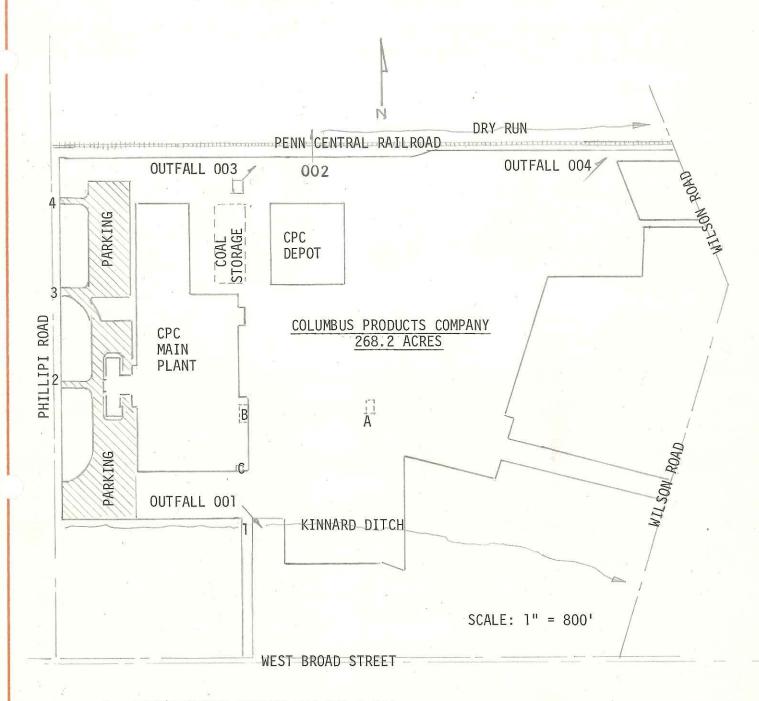
including the possibility of fine and imprisonment.

G. F. DIEKMANN

PAGE 4 OF 5

CONTINUE ON PAGE 5

V. FACILITY DRAWING (see page 4



A - PAINT SLUDGE DRYING PIT 24' X 24'
B - SALVAGE AREA, DRUM HANDLING AND STORAGE 80' X 240'
C - LIME NEUTRALIZATION AREA, ACID WASTE TO SANITARY SEWER 20' X 40'

1,2,3 & 4 - GATE NUMBERS



JUN 0 2 1983

CERTIFIED SWILL
REQUESTED REQUESTED

5m-13

Br. Richard L. Buntington Columbus Products Co. 300 Phillipi Road Columbus, Chio 43228

> Re: Columbus Products Co. EPA I.D. No. OHD 095030979 300 Phillipi Road Columbus, Ohio 43228

Dear Mr. Buntington:

The above referenced facility is a hazardous waste treatment, storage, or disposal facility subject to the Resource Conservation and Recovery Act (RCRA) as amended. Pederal regulations (40 CFR Part 265 Subpart 8) require that such a facility shall provide to the United States Environmental Protection Agency (U.S. EPA) proof of financial assurance for closure by July 6, 1982, and liability coverage by July 15, 1982, (40 CFR 265.143 and 265.147 respectively).

To date U.S. EPA has not received these proofs; consequently, the facility is in violation of requirements of 40 CFR Part 265 Subpart E. The Agency considers these financial responsibility proofs as significant requirements of the hazardous waste regulations. Pailure to provide these required proofs within 30 days of receipt of this notice may subject the facility to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation. Please forward the financial responsibility proofs to:

PCRA Activities Attn: Financial Requirements P.O. Box A3587 Chicago, Illinois 60690

If you have any questions or desire additional information, please contact Mr. Charles B. Slaustas of my staff, at (312) 353-2474.

Sincerely,

William Miner, Chief Technical, Permits, and Compliance Section

cc: Deborah L. Tegtseyer, OEPA

bee: Thomas B. Golz, TPCS

CB1 WHUN 6/2/83

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

HAZARBOILS WASTE

MANIFEST	DOCUMENT	NUMBER	
81-008			

		81-008					
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E.P.A. ID Code No				Phone	514) 272-	4468	
Address			National Re	sponse C	enter	1-800)-424-8802
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Signature (Conc.)	Juden		was a second		Date 🚄 😑	10-8	/

STRAIGHT BILL OF LAUTING 11:24 to 11/0

ORIGINAL - NOT NEGOTIABLE

MANIFEST DOCUMENT NUMBER

63-002

TO:	Systech Liquid Treatr	nen t	IFROM:					
T/S/D FACILITY c/o General Portland, Inc.			Generator		bus Products Co.			
E.P.A.	ID Code No. 0HD005048947		E.P.A. ID C	Code No.		10095030979		
Addres			Address			O MMXXXXX Phillipi Rd.		
Destin	ation Paulding, Ohio		Origin			mbus, Ohio 43228		
Phone	(419) 399-4835		Phone		(614)	272-4401	4466	
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STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST	DOCUMENT	NUMBER
83	- 001	

	,									
TO:			FROM:							
T/S/D	FACILITY Solvent Resource Recov	<u>ery, Inc</u>	c Generator Columbus Products Company							
L.P.A.	ID Code No. 0HD093945293		E.P.A. ID Code No. 0HD095030979							
Addres: Destina	1337 1 1111 1 11114 9 13774		Address 300 Phillipi Road							
Phone		45449	Origin Phone			Ohio 432	28			
	(513) 859-6101				514) 272					
No Shipping Units	D.D.T. PROPER SHIPPING NAME	HAZAF	ID CLASS	Haz Mai ID No	EPA Haz Waste No	WEIGHT	LABELS REQUIRED (or Exemption No.)			
Bulk	1,1,1 Trichloroethane (spent)	ORM	-A	UN2831	F001	823 1ь	NONE			
Bulk	Methylene Chloride (spent)	ORM	-A	UN1593	F002	8,777 #	NONE			
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					THE STATE OF THE S					
					And Street, and a second stree					
PLACA	RDS REQUIRED NO PLACARDS REQUI	RE D		<u> </u>						
T i te	NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding.									
under t or any bill of Supper and his	VED, subject to the classifications and tariffs in effect on the date of the issue of se unknown), marked, consigned, and destined as indicated above which said currents be contractly agrees to carry to its usual place of deflivery at said destination, if of all property over all or any portion of said route to destination and as to sect of all property over all or any portion of said route to destination and as to sect in the destination and as to sect in the destination of the date of shipper inerby certifies that he is lamillar with all the bill of lading terms and conditions as larger.	er time word carrier of its route, otherwis t party at siny time in it. s in the governing of	being understood through 6 to deliver to Another of Herested in all or any s Bassification and the sai	mount this contract as earrier on the route to aid property, that ever id terms and condition	meaning any personant desimation. The service to be personal agreements agreement to the service	n or corporation in possible in the state of a state of	session of the property s to sech carrier of all be subject to dil the sccepted for himself			
T/S/D	TERNATE DESTINATION (EMERGENCY FACILITY NONE		CONTACT		Bryant R	SEINEORN i ley	1A110N			
E.P.A.	ID Code No.		Phone (614) 272-4401							
Address Destina			National Response Center 1-800-424-8802 in D. C. 426-2675							
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	Smith day Bryant Ri					anuary 18				
IKANSE	ORTER#1 Solvent Resource Reco Box 453	very. In	C.	(Carrier 1997)	E.P.A. ID N	o. <u>OHDO93</u>	945293			
City		45449	State	Zip		Phone <u>(513</u>) 859-6101			
Transport Signature	ter No. 1 This is to certify acce				1	118/83	3			
TRANSF	PORTER #2	Path Mind United Inheritation and Communication	ACTION OF THE PARTY OF THE PART	(E.P.A. ID N	0				
Address_		····								
City	/ A W					Phone				
Transpor Signature				waste shipr	nent. Date					
	MENT/STORAGE/DISPOSAL FACILITY	CONTRACTOR OF THE PROPERTY OF	All annuals a feet from the control of the control	Priggraph/planeaustracis/pressymmerendentracis/dxtdis/EG/M		Contraction of the Contraction o				
T/S/D F	/ **	the hazardo	ous waste for	treatment, s	torage, or	disposal.	- \			

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

HAZARDOUS WASTE

MANH	FEST	DOCUMENT	NUMBER
IVI/ IVI		DUCUMENT	NUMBER

82 - 003

COLUMBUS STEEL DRUM NO. 000476

			- Rest - A Market and rest of great and a			2/1/20 E			
TO:				FROM:					
	FACILITY	<u>Columbus Steel Drum</u>	Co.	Generator		Columbus	Products	Co.	
	ID Code No.	AND OTTOOTO		E.P.A. ID C	Code No.	OHD095030979			
Addres		1385 Blatt Blvd.		Address		300 Phillipi Road			
Destina Phone	ation	Blacklick, Ohio 4300	4	Origin			. Ohio 43	228	
SERVICE CONTROL OF THE PROPERTY OF THE PROPERT		(614) 864-1900		Phone		(614) 27	2-4401	BETTATOLUGUS GOLDAN ANTONIO POR SIL POR SIL POR CONNECTION AND SIL POR SIL PO	
No Shipping Units	D.O.T.	PROPER SHIPPING NAME	HAZAR	ID CLASS	Haz Mat I,O No	EPA Haz Waste No	WEIGHT	LABELS REQUIRED (or Exemption No.)	
124		s containing waste	Flammab	le liquid	UN1993	F 0 03	15100	Flammable	
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	RDS REQUI	The state of the s	···						
NOTE - Who	ere the rate is depende agreed or declared va	ent on value, shippers are required to state specificate of the property. The agreed or declared value	ically in writing	Subject to Section 7 of the cond on the canaligner, the consigner	shelf sign the fullowing si	blemot		REIGHT CHARGES	
18 1	nereby specifically sta	ited by the shipper to be not exceeding	or the property	The certain shall not make delivery of this employed athour payment of freigns and all other tearful charges PREPAID COLLECT					
neor.		Per			(Signature of Con				
. under 6	the contract) some in ca-	sifications and tariffs in effect on the date of the issue of fsigned, and deathned as indicated above which said carry try to its usual place of delivery at said gastination, if or or any portion of said quite to fastination and as in each	ai (iii) word carrier	being understood citional	nout this contract as	i maaning any peraon	or corporation in pas-	sassion of the property 💸	
or any bill of Shippe	of, said property over all lading ferms and condition	by to its usual pace in derivery at said gestination, if or or any portion of said route to destination and as to each has in the governing classification on the date of shipmen is familiar with all the bill of lading terms and conditions	party at any time to	sterested in all or any sa	lid property, that eve	ary service to be peri	t is mutually agreed a formed hereunder shal	s to each center of ell i be subject to alt the	
and bis	assigns.	is tamittar with all the bitt of lading leams and conditions	in the governing at	essification and the sale	d terms and condition	ns are hereby agreed	to by the shipper and	accepted for himself	
AL	TERNATE DE	STINATION (EMERGENCY	ng y	T.	E : RENTAY	A THE STATE OF	SE INFORM	AATIAN BARA	
	FACILITY_			CONTACT		ryant Ri			
				OOMINOI	Phone	614) 272	-4401		
Address	S			National Response Center 1-800-424-8802					
Destina	ition				caponae C	cnter	in D. C.	426-2675	
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tor tran	sportation accor	his abuse jumed materials are proper ding by the applicable regulations of	tv emanified Lithe Departm	i, ammerimed, pa ment of Transpo	មេសារ៉ូម៉ាក់, មេម។ riation and t	Neden Habel he EPA.	ad, and are it	i propari condition	
Generato		Ula On							
	Imim	ff Day Bryan	t H. Ril	ey		Date No	vember 8,	1982	
TRANSF	ORTER/#1	Columbus Steel Drum Co			talo de la colonia de colonia de		ОНДООО.7		
Address_		ችግነት እንደ ነገር እን ነ						23070	
City		Blacklick, Ohio 43004		State	Zip		Phone (614)	864_1900	
		This is to certify accep							
Transport Signature	ter No. 1							3000	
<u> Anna Principa and Anna Anna Anna A</u>	The second of th	indestillada c	Market	// <u> </u>	<u> </u>	Date <u>IVO V</u>	<u>emper 8.</u>	1982	
	PORTER #2					E.P.A. ID No). <u> </u>		
Address_	-								
City							Phone		
Transpor	ter No. 2	This is to certify acce	ptance of t	he hazardous	waste ship	ment.			
Signature		Security and a security of the							
TI. TA	AENT/STORAG	GE/DISPOSAL FACILITY	THE STREET, SHIP CONTRACTOR OF STREET,						
		•							
	ACILITY 🎤	This is to certify acceptance of	the hazardo	us waste for t	treatment, s				
Signature	Kan	ad Fransi				Data /	1-19 1		

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		STATE STATE	OT NEGOTIABLE					82 - 00	2	
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i I		0.10	11,00 Am							
	TO:		Systech Liquid Treat	ment	FROM:					
	T/S/D	FACILITYC/C	<u>General Portland, In</u>	С.	Generator				Products	Co.
		ID Code No.	OHD005048947	···	E.P.A. ID	Code	No.	<u>0HD09503</u>		
	Addres Destina		Box 266		Address			<u>300 Phil</u>		
	Phone	ation	Paulding, Ohio		Origin Phone				. Ohio 43	3228
	No Shipping		(419) 399-4835					(614) 27		
	Shipping Units	DOT PI	ROPER SHIPPING NAME	HAZAI	RD CLASS	i D	Mat Np	Haz Waste No	WEIGHT	LABELS REQUIRE (or Exemption No.
	BULK	Waste Pa	int Solvent	F1 ammab	le Liquid	-614	1263 -	F003	5100 GAL	(FLAMMARE
		·				LIN	1993			
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0	l the	agreed or declared valu	on value, shippers are required to state spec of the property. The agreed or declared value	ifically in writing ue of the property	Sabject to Section / of the con- politic consignor, the consignor the carrier shall not make deter	r kiwati atgo 1	les following sta	DE IGERL.		REIGHT CHARGES EPAID COLLECT
		hereby specifically state	d by the shipper to be not exceeding							
9	RECE	IVED, subject to the classif	Callobe and teriffy in affect on the data of the invite	of this Bill of Ledin	n. the property described		grature of Cons		coted (controls and c	podition of controls of
	under	the contracti antees to carry	gred, and destined as indicated above which said out to its usual place of defivery at said destination, it any portion of said route to destination and as to each of the greaters and the greaters are the said destination.	On the course otherwise	pering understood inroug	inout this	contract as	meaning any person	or corporation in pos	session of the property
	Shippe	listing terms and conditions or hereby certilles that he is is usuigns.	in the governing classification on the date of shipma familiar with all the bill of lading forms and condition	ont. and. ans in the governing c	lassification and the sai	and prospen id teamer as	nd condition	is and hateby wolland	ormed hereunder shall no by the shipper and	toe subject to all the
		o wounging.								
	All Septimina surgemental single-for	a take a take a same a sam	TINATION (EMERGENCY		1	AND REAL PROPERTY.	+ Harris Programme Co.	Total Control of the	SE INFORM	MATION
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	Addres	ID Code No						(614) 27		
	Destina			***************************************	National R	espo	nse C	enter	1-80 in D. C.	0-424-8802 426-2675
				CERTIFI	CATION					
	filis (a	i in Partify Hai Ha Isportation accord	annya mamail materials are ping yng fo'the applicable regulations	arly alakallia	d. Hessilabi in	al kiido	et, lister	HANNE DA	sa ana ara i	r projest standiilaji
	Generat	1/2 1		or the Depart	ment or (ranspe	лано	II and ti	IG E.F.A.		
	Signatur	Annual Annual Park	Holes Bryant	Riley, S	uprv. Salv	age		Date	October 8	3, 1982
	TRANS	PORTER#1	Ace Liquid Waste Hau	larc				CATACISM manager) contributes Service and	. OHDO 1.76	00000
		. 475 6 20 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	3715 Beechmont Court					L. F.A. ILFNI	· VIIIVI I / I	1033UQ
	City		Cincinnati, Ohio		State		Zip		Phone (5)3	3) 871-8397
			and the second s						· · · · · · · · · · · · · · · · · · ·	
	Transpor Signatur	rter No. 1	Dis is to certify acc	optance or t	ne nazardous	wasie	៖ ទាយ អ ា	lett.	October 8	2 1092
	water to be seen and the seen a		·							
		PORTER #2)	
	OILY								Phone	
	Transpo	rter No. 2	This is to certify acc	eptance of	the hazardous	wast	e shipi	ment.		· (
	Signatur									•

ORIGINAL - RETURN TO GENERATOR

This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.

Date 10-8-2

Date 10-8-8

THLATMENT/STORAGE/DISPOSAL FACILITY

T/S/D FACILITY

Signature

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

HAZARDOUS WASTE

MANIFEST	DOCUMENT	NUMBER
	82-001	

, . I					-POTAMANA SANAA-A			
TO:	Service Control of the Control of th		A Company of the Comp	FROM:				
T/S/D	FACILITY Sol	vent Resource Reco	very, Inc.	Generator	C	olumbus I	Broducts	Co.
E.P.A.	ID Code No. 0HD	093945293		E.P.A. ID	Code No. C	HD095030	979	
Addres		<u> Infirmary Road</u>		Address		00 Phill		
Destina Phone		t Carrollton, Ohio	<u> 45449</u>	Origin			Ohio 433	XX 43228
		3) 859-6101		Phone		6]4) 272	-4401	
Na Shipping Units	DOT PROP	ER SHIPPING NAME	HAZAF	D CLASS	Haz Mat ID No	EPA Haz Waste No	WEIGHT	LABELS REQUIRED (or Exemption No.)
b ulk	Waste Methyl	ene Chiloride)RM-A	UN1593	F002	1000 ga1	
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NOTE - Wh	ere the rate is dependent on va	lue, shippers are required to state an	ecifically in writing	Subject to Section / of the cond	sitiona, if this shipment is to	be delivered to the penaligr	ned without recourse E.C.	REIGHT CHARGES
the	ingreed or declared value of th	ne property. The agreed or declared whe shipper to be not exceeding. Per	alue of the property	on the consignor, the consignor The carrier shall not make defi	e eheli argn the followrig ste	letto ni i payment of freight and all :	3 * *	EPAID COLLECT
under or any bill of Shippe and hi	the contract) agrees to carry to its of, said properly over all or any po- fading terms and conditions in the or hereby certifies that he is familia assigns.	s and tariffs in effect on the date of the ist and designed as indicated above which said usual place of delivery at soid destination, rition of said route to destination, and as to governing classification on the date of sing ir with all the bill of lading leans and condi-	if on Hs route, otherwis- each party at any time in pment. (tions in the governing ci	being understood induction in the set of deliver to another contends to any set assisting and the sale	mout this contract as arcier on the route to aid properly, that eve d terms and condition	meaning any person said destination. It ry service to be perfo is are heraby agreed	or corporation in post is mutually agreed as ormed hereunder small to by the shipper and	seasion of the property s to each carrier of all be subject to sil the accepted for himself
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	FACILITY Non			CONTACT	,		. Hunting	aton .
Addres						614) 272		
Destina				National R	esponse C	enter	1-800 in D. C.	0-424-8802 426-2675
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Generato Signaturo	" Buttle			Riley, Su			Mav	6, 1982
		uant Parausa Paa						
Address.		vent Resource Reco . Box 453	TALLA TILL			E.P.A. ID No	. <u>unuy3</u> 2	749693
City	~	t Carrolton, Ohio	45449	State	Zip	[Phone	
Transpor Signatur	ter No. 1	This is to certify ac	ceptance of th	ne hazardous	waste shipm			359- <u>6</u> 101
i imaja main aminin	PORTER #2		called principal subspace representation of the second subspace repres		Cultivities and the contract of the contract o	Date	CARSON SPORTS CANONICATION	6, 1982
	ORIEK #2	,				E.P.A. ID No	•	
				State	Zin	· · · · · · · · · · · · · · · · · · ·	Phone -	
Transpor	ter No. 2	This is to certify a					. ~	
Sinnatur		THE STATE OF THE PROPERTY OF T		er en	Control of the Contro	Date		
TIATI	7	ISPOSAL FACILITY					- Constant and Constant	
T/S/D F	ACILITY his i	s to certiff acceptance	of the hazardo	us waste for	treatment, s	torage, or d	isposal.	

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST	DOCUMENT	
81-	-020	

								THE STATE OF THE S	
TO:	TOUR DESCRIPTION OF THE PROPERTY OF THE PROPER			FROM:					
			Generator		COLUMBUS PRODUCTS CO.				
	ID Code No.	OHD083377010		E.P.A. ID Code No.		OHD095030979			
Address		10147 SPRINGFIELD F	PIKE	Address			LIPI ROAL)	
Destina	tion	CINCINNATI, OHIO 4		Origin			5. OHIO 43		
Phone	RICCOUNTY BEST DESCRIPTION AND ADMINISTRATION OF THE PROPERTY	(513) 772-2818		Рһоле		(614) 2			
No Shipping	D.O.T. 9R	OPER SHIPPING NAME	4147.49	D CLASS	Haz Mat	EPA Haz Waste	THE RESIDENCE OF THE PARTY OF T	LABELS REQUIRED	
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is h	agreed or declared value ereby specifically stated	of the property. The agreed or declared vi by the shipper to be not exceeding	afue of the property	The carrier shall his make digit	ivery of this shipment with	rut payment of freight and al	Fother Having charges PRE	PAID COLLECT	
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		o its usual place of delivery at said destination, my portion of said route to destination and as to n the governing classification on the date of ship		e to defiver to enother c aterested in all or any s	arrier on the route to aid property, that ev	o said destination. I ery service to be per	It is mutually agreed as formed hersunder shall	to each carrier of all be subject to all the	
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	FACILITY			CONTACT	1441770			14) 272-4468	
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Generator Signature		len BRY	YANT H. RI	LEY SUPRV.	-SALVAGE	Data	DECEMBER :	16. 1981	
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Address_		10147 SPRINGFIEL	D PIKE	LINCA		E.P.A. ID N	o. Ordoug	33//U10	
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Signature		onn Wherak	1			Date	DECEMBER 1	6 , 1 981	
TRANSF	ORTER #2	V					0		
Address_								-	
City				State	Zip		Phone	*	
		This is to certify ac	ceptance of	the hazardous	waste shir	ment.			
Transpor					comp				
* plant4our		- / p. 1 * K	and the state of t	244 ed William (Milliam) Wendrobe and Administration	THE PROPERTY OF STREET	Date			
1. A3A	ien i/3 lukage	E/DISPOSAL FACILITY							
1/2/10-	ACILITY & Th	is is to certify acceptance	of the hazard	ous waste for	treatment,	storage, or	disposal.		
Signature	AULITY OF	N Dage				Data /	2/10. 10.	,	

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

81 - 018

To:	A Hoteleon account to the property of the second se	SYSTECH_		FROM:				
T/S/D	FACILITY C/O	GENERAL PORTLAND INC.	- Proposition A	Generator		COLLIMBUS	PRODUCTS	CO
E.P.A.	ID Code No.	OHD005048947		E.P.A. ID (Code No.	OHD095030		co.
Addres		BOX 266		Address			IPI ROBD	
Destin	ation	PAULDING, OHIO		Origin	7.44 M		OHIO 43	
Phone	EVILLENCE CONTRACTOR OF THE PROPERTY OF THE	(419) 399-4835		Phone		(614) 27		6.4.1.1
No Stippinii	DOTPRO	PER SHIPPING NAME	44744	D CLASS	Hay Mat	E P.A		LABELS REQUIRED
Units					I D No	Haz Waste No	WEIGHT	(or Exemption No.)
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1	WASTE PAINT	AND WASTE PAINT SOLVE	ENT FLAM	MABLE LIQU	ID UN126	3 F003	5500 GAL	FLAMMABLE LI
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nuger	the contract) agrees to carry to i	ts usual place of delivery at said destination, if on I	its route, otherwise	to deliver to another ca	arrier on the route to	magning any person said destination ()	or corporation in poss	sasion of the property
Shippe and hi	rading lerms and conditions in t rhereby contifies that he is tem savatures.	portion of aurid route to destination and as to each p he governing classification on the date of snipment. itles with all the bill of lading terms and conditions s	in the governing cla	sailication and the said	diterms and condition	as are namely alreed	to by the ships red of	eccepted for himself
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	FACILITY			CONTACT			<u>HUNTING</u>	TON
E.F.A.	ID Code No		ş			<u>614) 272</u> -	<u>-4468</u>	
Destina	s			National Re	esponse C	enter		0-424-8802
			Ma:Fulali	A-7 6 M			in D. C.	426-2675
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for tran	sportation according	ાં o the applicable regulations of	the Departme	ent of Transpo	rtation and th	ie E.P.A.		To the second second
Generato		BRYANT H	l RHEY	SUPRVS	ΔΙ ΛΑCΕ		DECEMBE	२ 9, 1981
Signature	CONTRACTOR OF THE PROPERTY OF			JOINT		Date		
TRANSF	ORTER 11	ACE LIQUID WASTE HAUL	ERS			E.P.A. ID No	OHD017	509 900
Address_		3715 BEECHMONT CT.						
City		CINCINNATI, OHIO		State	Zip		Phone (513)	871-8397
T		This is to certify accep	tance of the	e hazardous v	waste shion	ent.		
Transpor Signature	ter No. 1	and			·		DECEMBE	3 9. 1981
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"ionagure)					Date		
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Signature	· Care	- a laps				Date Zo	10.81	

STRAIGHT BILL OF LADING

MORIGINAL -NOT NEGOTIABLE

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		Diving party.				··				_		
333 NHHX	TO:			2/1-22	W-W-	FROM:					- Commence de la comm	
		FACILITY		IRCE RECOV	/ERY INC			ÇOLUMBUS	****	DUCTS	CO.	
			0. OHD093945293			E.P.A. ID C		OHD095030				
湖顶湖田-	Addres: Destina		4301 INFIRMAR		-1.1.7s	Address		300 PHILI				***************************************
EXENTA-	Phone	311011	WEST CARROLTOM (513) 859-610		5449	Origin Phone		COLUMBUS			5228	
	No							(614) 27: FPA				
	Shipping Units		PROPER SHIPPING N	AME	, and HAZA	RD CLASS	Haz Mai ID No	Haz Waste No	WE	IGHT		REQUIRED Option No.
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	under (the contract) agrees to ca	arry to its usual place of defivery at a	said destination, if un	n ils route, otherwise	se to deliver to another or	ghout this contract as . carrier on the route to :	meaning any person- Isaid destination. If	ior corporai Fis∃nutua∐	itton in post Iv aarsed st	seasion of the parte	property er of sil
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-	TRANSF	PORTER#1_	SIDNEY TRUCK /	AND STORAG	√GE			E.P.A. ID No	o OHI	00077	78103	
	Address_	. *	777 W. RUSSELL	<u>L</u>					/•			
4	City		SIDNEY, OHIO			State	Zip 45	365	Phone	889-	7485	
	Tmncoor	-A B1	✓ This is to	certify accer	ptance of t	he hazardous	waste shipn					
	Signature	rter No. 1 12. 6	N			770 110201 0000	•		OVEME	R 1	9,1981	
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	City							W				
	J ,						Zip		Phone_		······································	
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	Signature	3			With the same of t			Date				
	orTh	MENT/STORA	GE/DISPOSAL FAC	ILITY		And the second s	entire, eleptones d'Atomica soci siene e actique se; y garante e	*Holland Control of the Control of the Control of Control	CARL STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, S	ACHICA CONTRACTOR AND ACTION ACTION AND ACTION ACTION ACTION AND ACTION ACTIO	AND ENGINEERING STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET, STREET,	NOTE: THE PARTY OF
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	T/S/D F. Signature		Jan	A	ng nazaruo	ous waste for	treatment, s	torage, or o	∍ispos≀ '∠	at.		-pe
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ORIĞINAL - RETURN TO GENERATOR

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFE	CUMENT	NUMBER
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TO:					FROM:				
	ACILITY	ROBERT ROSS		VC.	Generator			PRODUCTS	CO.
	D Code No.	OHD048415669		·	E.P.A. ID C				
Address	·	394 GILES RO		····	Address			_IPI_ROAD	
Destinati Phone	ion	GRAFTON, OH			Origin			, OHIO 432	228
No		(216) 748-2			Phone		(614) 272	DE REGRESSIONES CONTRACTOR CONTRACTOR	
Shipping Units	D.O.T. P	POPER SHIPPING	NAME	I I AZAR	ID CLASS	Has Mat ID No	EPA Haz Waste No	WEIGHT	LABELS REQUIRED (or Exemption No.)
31	TOLUENE C	DIISOCYANATE		POISON	B.	UN2078	U223	1550 GAL	• POISON
				<u> </u>	*CLUBAL COMPANY				
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under the c	contract) agrees to carry said property over all or ling terms and conditions broby certifies that he is	ifications and tariffs in effect or signed, and destined as indicate by to its usual place of detivery or any portron of said route to de in the governing classification of lamitier with all the bill of tack	al said destination, if o	on Its route, otherwise	e to deliver to another ca	mout this contract as Birrial on the route to	s meaning any person o s≖id destination, it	t is mulually agreed as	session of the property s to each canter of all
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T/S/D FA	ACILITY	NONE			CONTACT		and tolerand transmission and an extension of the	HUNTING	market and the second s
E.P.A. II	O Code No				İ		(614) 272		
Address_ Destinati					National Re		enter	1-80(in D. C.	0-424-8802 426-2675
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for Transpo Generator	ortation accord	e abuve indication in the ding to the applicable of the applicable	L)	DIZ (MAA) 1.1.1.	KILEI		he E.P.A.	. 1944 , 1944 1949 1949	· 陳朝縣L 6316111301
Signature C	t Shall		S	SUPERVISOR	R, SALVAGE		Date	NOVEMBER	2, 1981
TRANSPO	RTER#1	ROBERT ROSS	& SONS IN	iC.			E.P.A. ID No		
Address		394 GILES RO	DAD	The second secon	States (Africania) residente de la companya del companya de la companya de la companya del companya de la companya del la companya de la comp			The second secon	
City		GRAFTON, OHI	.0		State	Zip_4/	+044	Phone (216)	748-2171
Transporter Signature_		<i>></i> 4 . 2 / 20 0	o certify acce	eptance of th	ne hazardous v	waste shipn	ment. Date	NOVEMBER	2, 1981
TRANSPO	RTER #2	Manager and Property of the Parket of the Pa	And the second s	Non-200 Maria Maria Carro Des-Ordericano		On Delicination in the second of the second		halfe like the manuscript of the production of	
							E,F,A, 10 ,,,)	
City					State	Zip		Phone	
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-	NT/STORAG	SE/DISPOSAL FA	ACILITY /			Algebra de la la despublica y portuga de maio	Date	PARTICIONAL PROPERTY OF THE PR	
T/S/D FAC	CILITY	his is to certify a	icceptance of	he hazardo	us waste for t	treatmeπt, ε	storage, or d	lisposal.	108

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST	DOCUMENT	NUMBER
81-014	4	

TO:	90	SYSTECH LIQUID TREATM	ENT	FROM:				
T/S/D	FACILITY C	O GENERAL PORTLAND I	Generator		COLUMBUS PARDUCTS CO.			
E.P.A.	. ID Code No.	OHD005048947		E.P.A. ID	Code No.	OHD09503	· · · · · · · · · · · · · · · · · · ·	
Addres		BOX 266		Address		***************************************	LIPI ROA	D
Destin	ation	PAULDING, OHIO		Origin		COLUMBUS	oHIO	
Phone No		(419) 399-4835		Phone		(614) 27	72-4401	
Shipping Units	DOT PP	IOPER SHIPPING NAME	HAZAR	D CLASS	Haz Mal ID No	EPA Haz Waste No	WEIGHT	LABELS REQUIRED (or Exemption Na)
1	WASTE PAINT	& WASTE PAINT SOLVENT	FLA	MMABLE	F003			
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	0998			- Post of Carlotte				The state of the s
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		TINATION (EMERGENRY)		EN	TELEGY (AV			
	FACILITY			CONTACT			L. HUNTI	NGTON
E.P.A.	ID Code No				Phone	(614) 27		
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			BERME	ATION				
iur tran	sportation accord	univa taumu materials are proper o the applicable regulations of	ity siaselijed f the Departm	, Bushilled, M ent of Transpo	ethiuse, mail ortation and th	e E.P.A.	क्षाः मान्ने बारु ॥	t tacabble sembilitions
Signature	Druth 1	BRYA		LEY, SUPER	RV. SALVA	GE _{Date} SE		
	PORTER #1	ACE LIQUID WASTE	T-P-Co-M-MAN-Warrance you consequence you page			E.P.A. ID No	. OHD0176	09900
City		3715 BEECHMONT CT, CINCINNATI, OHIO					/E17\	071 0707
J. ()					-		Phone (515)	871-8397
Transpor Signature	ter No. D GA	This is to certify accep	ptance of th		waste shipm		PTEMBER	15, 1981
	PORTER #2		or account of the second of th		Territoria de la companya della companya della companya de la companya della comp	E,P.A. ID No		
City				State	Zip		Phone	
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T/S/D F Signature	3400 E 1 1 4 G	Clary Chap	the hazardo	us waste for	treatment, s	torage, or d	and the same of	
		ORIGINAL - F	RETUR	N TO GE	NERAT	R		

STRAIGHT BILL OF LADING

ORIGINAL - NOT NEGOTIABLE

MANIFEST	DOCUMENT	NUMBER
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T/S/D FACILITY SOLVENT RESOURCE RECOVERY INC.			Generator COLUMBUS PRODUCTS CO.					
E.P.A.	ID Code No.	OHD093945293		E.P.A. ID	Code No.	OHD095030	979	<u> </u>
Addres		4301 INFIRMARY F	ROAD	Address		300 PHILL		——————————————————————————————————————
Destina	ıtion	WEST CARROLTON,	OHIO 45449	Origin			OHIO 432	228
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E.P.A.	ID Code No				Phone((614) 272	-4468	
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STRAIGHT BILL OF LADING

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Phone		(614) 864-1900) * †	Phone			, OHIO 43	228
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T/S/D FACI				CONTACT	Name	RICHARD	L. HUNTIN	GTON
E.P.A. ID Co	de No				Phone	(614) 27	2-4468	
				National Re	sponse C	enter	1-800	0-424-8802
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Generator /								
Signature	1m 21	Kily BRYA	NT H. RIL	EY, SUPERV.	<u>, - SAL</u> VA	GEDate	JUNE	23, 1981
TRANSPORTE		COLUMBUS STEEL DRUM	CO.			FDA ID No	OHO OHO	0723676
Address	7	1385 BLATT BLVD.			·····	C. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	, <u> </u>	0729070
City		BLACKLICK, OHIO 4300	4	State	7 in	·····	Bhana (614) 864-1900
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Signature						Date	JUNE 23,	1981
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STRAIGHT BILL OF LADING

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MANIFEST	DOCUMENT	NUMBER
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To:		FROM:	FROM:				
1/S/D	FACILITY SOLVENT RESOURCE RECOVERY IN		Generator COLUMBUS PRODUCTS & CO.				
E.P.A.	ID Code No. OHD093945293		Code No. OHD0950309				
Addres Destina		Address	300 PHILLII				
Phone	MEST CONNOCTOR SILV TOTAL	Origin	COLUMBUS, (
	(513) 859-6101	Phone	(614) 272-	Company of the compan			
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or any bill of Shipper and his	IVEO, subject to the assistications and tariffs in effect on the date of the issue of this Britises unknown), marked, consigned, and destined as indicated above which said carrier (the worked contract) parties to carry to its usual place of delivery at said destination, if on its route, of, said property ever all or any portion of said proute to destination and as to each party at a lading term and conditions in the governing classification or the date of shipment, it hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification.	ny line interested in all or any verning classification and the sa	CHARLES ON THE TOUTE ID SAID UBSTINATION, II	is multiparty agrees as to each carrier of all immediate moders shall be subject to all the to by the shipper and accepted for himself			
	FACILITY NONE		Day of early to prove the	. HUNTINGTON			
	ID Code No,	CONTACT	Name	<u> </u>			
Address	8	· · · · · · · · · · · · · · · · · · ·					
Destina		National F	Response Center	1-800-424-8802 in D. C. 426-2675			
		TIECATION		W 5. 0. 420-2075			
for trans	to certify that the above required materials are properly diag sportation according to the applicable regulations of the D	epartment of Transp	ortation and the E.P.A.				
Generato Signature	BR BR	YANT H. RILEY	SUPERV SALVAGE	JUNE 16, 1981			
TRANSF	ORTER #1 ACE LIQUID WAS'TE HAULERS	State and the second contract of the second c	E.P.A, ID No	OHD017609900			
Address_	3715 BEECHMONT COURT						
City	CINCINNATI, OHIO	State	ZipF	Phone (513) 871-8897			
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STRAIGHT BILL OF LADING

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MANIFEST	DOCUMENT	NUMBER
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To:		COLUMN ASSOCIATION		FROM:			····	
	FACILITY	SOLVENT RESOURCE RECO	VERY INC.	Generator			PRODUCTS	co.
E.P.A.	ID Code No.	OHD093945293		E.P.A. ID Coo	de No. OH	D095030	979	
Addres		4301 INFIRMARY ROAD		Address			IPI ROAD	
Destina Phone	ation	WEST CARROLTON, OHIO	45449	Origin			OHIO 432	228
Phone		(513) 859-6101		Phone	3)	14) 272	-4401	
Shipping Linis	DOTIF	PROPER SHIPPING NAME	HAZAR	D CLASS	Hez Mat IB No	EPA Haz Waste No	WEIGHT	LABELS REQUIRED (or Exemption No.)
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	FACILITY	NOINE					HUNTINGTO	М
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for tran		fing to the applicable regulations	of the Departn	ient of Transporta	ation and the	E,P.A.		
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	ORTER #1	ACE LIQUID WASTE HAUL			512 945 NESSTAND			
Address		3715 BEECHMONT COURT	Hara I Va Layl			P.A. ID NO	01100 1 700	77700
City		CINCINNATI, OHIO		State	7 in		phone (513)	871-8397
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•	ter No. 1	This is to certify acc			·			
Signature			Antistration continues of the property of	menomental and any many from the first construction and any other	STATE OF STREET	Date	UNE 16, :	<u> 1981</u>
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City				State	Zip	F	Phone	
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Signatur	o	7204				Date	616	- ゲノ

THIS SHIPPING ORDER must be legibly tilled in, in ink, in bidetable Pencil, or in Carbon, and retained by the Agent.

MANIFEST DOCUMENT NUMBER

81-007

			\$-sec.		
To:	SYSTECH LIQUID TREATMENT	FROM:			
T/S/D FACILITY	C/O GENERAL PORTLAND INC.	Generator	COLLEGA	IS PRODUCTS CO.	
E.P.A. ID Code N	o. <u>040005048947</u>	E.P.A. ID Co	ode No. OHD0950	130979	***************************************
Address	BOX 266	Address	300 PH	LLIPI RD	
Destination	PAULDING OHIO	Origin		IS, OHIO 43228	
Phone	(419) 394-4835	Phone	(614)	272-4401	
No Shipping D.O.T	PROPER SHIPPING NAME HAZ	ARD CLASS	Hez Mei . FPA	18 WEIGHT LABEL	S REQUIRED
Units"		AND DIAGO	ID No 1997 NO	" "" IDI EX	emption No.)
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T/S/D FACILITY	hine	CONTACT:	Name RICHARD	L. HATTIGTON	
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Destination		—∣ National Re	sponse Center	1-800-424-1	
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Generator	BRYAI - BRYAI	UT H. RILE			
Signature	HEMINATED SALEKAIS	<u> X - SALVA</u>	Ole	<u> </u>	
TRANSPORTER #1_	WE LIQUID WASTE		E.P.A. ID	Bio.	
Address	3715 BEECHMAT CT.			CHUUL/DUS	14 1
City	CINCINNATI	State <u>Oi II</u>	LO_Zip	Phone	
T	This is to certify acceptance of	the hazardous w	asta shinment	(515) 87	1-8397
Transporter No. 1	· \				
	The state of the s		Date		
IKANSPURIER #2_			E.P.A. ID	No	
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UITY				Phone	
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T. TEMENT/SIUK	AGE/DISPOSAL FACILITY				i
T/S/D FACILITY	This is to certify acceptance of the hazar	rdous waste for tr	reatment, storage c	r disposal.	
Signature				1.0.01	

Larged in

Application Number 81-HW 505 Franklin County

September 9, 1981

SEP 14 1981 WASTE WHINAGEMENT BRANCH

EPA REGION V

Richard Huntington, Manufacturing Engineer Columbus Products Company 300 Phillipi Road Columbus, Ohio 43228.

Dear Mr. Huntington:

On April 23, 1981, Ken Humphrey of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself.

Enclosed is a copy of the report completed when your facility was inspected. This form illustrates those areas inspected at your facility for compliance with Interim Status Standards.

The following is a list of items found to be in violation of current regultions or those areas which will be covered by regulations not yet effective. The capital letter codes found to the left of each item are explained on the last page of the enclosed inspection form.

Subpart B: General Facility Standards

		·
CODE	ITEM	PAGE NO.
В	1 b)	P. 3-1 Refer to ISS Remark No. 4
В	1 c)	P. 3-1 Refer to ISS Remark No. 5
Α	1 e)	P. 3-2 Refer to ISS Remark No. 6
A	1 f)	P. 3-2 Refer to ISS Remark No. 6
В	1 g) 2.	P. 3-3 Refer to ISS Remark No. 7
В	1 g) 3.	P. 3-3 Refer to ISS Remark No. 8

Subpart D: Contingency and Emergency

CODE	ITEM	PAGE NO.
В	3 a) 3.	P. 3-5 Refer to ISS Remark No. 14
В	a) 5.	P. 3-5 Refer to ISS Remark No. 15
В	b)	P. 3-6 Refer to ISS Remark No. 16
В	c)	P. 3-6 Refer to ISS Remark No. 16

Richard Huntington Columbus Products Company September 9, 1981 Page 2

Partial Subpart G: Closure

CODE	ITEM	PAGE NO.		
A	4 a)	3-7 R	fer to ISS Remark No. 18. *Note: Must hav osure <u>estimate</u> also.	ė

Subpart I: Management of Containers

(CODE	ITEM	PAGE	<u>NO.</u>		A			
	В	1	4-1						
	В	1 b)	4-1	Refer	to	ISS	Remark	No.	19
	В	1 e)	4-1	Refer	to	ISS	Remark	No.	7

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours, Paul Flandon

Paul Flanigan, P.E.

Office of Hazardous Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V Ken Humphrey, CDO

CERTIFIED MAIL



Re: Franklin County OHD095030979

Mr. Richard L. Huntington Senior Manufacturing Engineer Columbus Products Co. 300 Phillipi Road Columbus, Ohio 43228 May 21, 1981

Dear Mr. Huntington:

My letter of May 5, 1981 regarding the results of the recently performed Resource Conservation and Recovery Act Interim Status Inspection did not contain all of the information about the inspection that it should have contained. The purpose of this letter is to correct that situation.

The previous letter should have noted that the inspection of the Columbus Products Company, Phillipi Road Facility was conducted on April 23, 1981 by Kenneth L. Humphrey of Ohio EPA and that Columbus Products was represented by John H. Park, Tom C. Huff and yourself. The letter also included a list of areas in which Columbus Product's may be out of compliance with the requirements of the RCRA regulations; that list was complete.

Please excuse the oversights on my previous letter; feel free to call if you have any questions.

Sincerely,

Kenneth L. Humphrey

Hazardous Waste Scientist Central District Office

KLH/sc

cc: Franklin County Health Department

cc: Mr. Don Day, Chief, OLPC

cc: Mr. Steve White, Acting Chief, OHMM

cc: Ms. Brenda Lillstrom S10, U.S. EPA, Region V

cc Ms. Frances Brunet, U.S. EPA, Region V

F. BAUNET

AART 1. GENERAL INFORMA		
U.S. EPA IDENTIFICATION NUMBER: 0	H D 0 9 5 0 3 0 9	7 9
Tacility: Columbus Products Compa	ny	
Address: 300 Phillipi Road		
City: Columbus	State: Ohio	Zip Code: 43228
Telephone: 614-272-4000	County: Franklin	
Facility Operator: G.F. Diekmann		
Title: President	Telephone:	614-272-4107
Facility Owner: White Consolidate	d Industries	
Address: 11770 Berea Road		
City: Cleveland	State: Ohio	Zip Code: <u>44111</u>
Telephone: 216-252-3700	County:	
Type of Ownership: X Private	Government	
Date of Inspection: 4/23/81	Time of Inspection	on:
Advance Notification? No	(Start) 9:00 ai	m
X Yes: Called 4:00 pm, 4/22/81	(Finish) <u>2:00 p</u>	m ·
Weather Conditions: Rainy, 62°F		
-	<u>-</u> -	
INSPECT	ION PARTICIPANT(S)	
(Mame)	(Title)	(Telephone)
1. Richard Huntington	Sr. Mfg. Engineer	614-272-4468
2. John H. Park	Mgr. Plant Eng.	614-272-4225
3. Tom C. Huff	Safety Supervisor	614-272-4287
		•

Oligical

Re: Franklin County OHD095030979 HWFAB 01-25-0505

RECEIVED

WASTE MANAGEMENT BRANCH April 23, F1982

Mr. Richard Huntington Senior Manufacturing Engineer Columbus Products Company 300 Phillipi Road Columbus, Ohio 43228

Dear Mr. Huntington:

Thank you for your written response to my letter of March 12, 1982, regarding the RCRA Interim Status Inspection conducted at the Columbus Products Company. The additional information you submitted should satisfactorily resolve the deficiencies listed in the March 3, 1982, Inspection Report. This office considers the 12 deficiencies cited in that report to be satisfactorily corrected, subject to verification by a reinspection of the facility, if necessary.

Once again, thank you for the time and effort you have expended to resolve this matter. Please feel free to contact me at 614-466-6450.

Sincerely,

Lundy J. Adelsberger Environmental Scientist Hazardous Materials Central District Office

LJA/sc

Ms. Kathleen Homer, SIO, U.S. EPA, Region V

cc: Mr. Bob Fragale, Technical Permits Section, HWFAB

cc: Ms. Paula Cotter, Inspections/Enforcement, DHM, C.O.



Re: Franklin County

OHD095030979 HWFAB 01-25-0505

Mr. H. A. Almy, Director Factory Engineering and Services Columbus Products Company 300 Phillippi Road Columbus, Ohio

November 9, 1982

Dear Mr. Almy:

On October 25, 1982, Columbus Products Company was reinspected by the Ohio Environmental Protection Agency to determine if it was in compliance with Federal/State Interim Status Hazardous Waste Regulations promulgated under the Resource Conservation and Recovery Act (RCRA, Public Law 94-580).

The enclosed inspection report is self explanatory and contains recommendations for correcting the deficiencies found during the inspection. This office requests that you provide a written response, within thirty days, to the following deficiencies/comments contained in the enclosed inspection report:

PAGE	QUESTION NUMBER	REQUIREMENT
2-2 2-2	5c 8, 9	Placards Personnel Training
3-2	ld, 3	Contingency Plan
5-1	4	Container Inspection

Please call (614-864-3195) if you have any questions regarding the inspection or RCRA regulations.

Sincerely,

Lundy J. Adelsberger

Environmental Engineer

Division of Hazardous Materials Management

Central District Office

801 X 1 VOR

WASTE MANAGEMENT BRANCH EPA BEGION V

LJA/sc

cc Ms. Kathleen Homer, SIO, U.S. EPA, Region V Ms. Paula Cotter, Compliance Unit, DHMM, C.O.

Enclosure



RCRA Inspection Report

EPA Identification Number OH D09	5030979	
HWFAB Permit Number (if appropri	ate) 01-25-0505	
Facility Name Columbus Produc	ts Company	
Location 300 Phillippi R	toad	
Columbus	, Ohio <u>43228</u>	
Person(s) Interviewed Mr. H. A. Almy Mr. Steve Ross Mr. Bryant Riley	Title Director, Factory Engineering Superintendent of Mair Supervisor of Salvage	Telephone ntenance (614) 272-4432 (614) 272-4436
Inspector(s)	Agency/Title	Telephone
Mr. Lundy Adelsberger	Ohio EPA EE II	(614) 864-3195
	Ohio EPA Ohio EPA	
	Installation Activity	
Mark One [X] Generator only (G) [] Transporter only (T) [] TSDF only [] G-T [] G-TSDF [] T-TSDF [] G-T-TSDF	indicating whic X7 General F and Preve Emergency Groundwat Closure a Tinancial X7 Container Tanks S02	2/T01
/_/ Waste Piles S03		mpoundments S04/T02
Land Treatment D81		cion/Thermal Treatment TO3
Landfills D80	Chemical/	'Physical/Biological TO4

RCRA INTERIM STATUS INSPECTION FORM

				HWFAB # 01-25-0505
PART				U.S. EPA I.D. # 0HD095030979
Faci`	Columbus Produ lity: Company		Address: 300 Phillipi Road	City: Columbus
State	e: Ohio	Zip Code: 4	3228 County: Franklin	Telephone: (614) 272-4000
			INSPECTION PARTICIPANTS(S)	
l	(Name) Mr. Bryant Riley		(Title) Supervisor of Salvage	(Telephone) (614) 272-4436
2.	Mr. Steve Ross		Superintendent of Maintenar	oce (614) 272-4432
3	Mr. H. A. Almy	-	Director, Factory Engineeri	ng & a constant
			Services <pre>INSPECTOR(S)</pre>	
1	Mr. Lundy Adelsber	ger	Environmental Scientist	(614) 864-3195
2			· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
3				
			INSTALLATION ACTIVITY	
Mark	One	If the sit	e is a TSDF, check the boxes indic	ating which regulations are applicable.
<u>_X</u> 7	Generator only (G)		ral Facility Standards, Preparedne	
	>90 Day Storage Transporter (T)		Prevention, Contingency and Emerge fests/Records/Reporting, Closure	Land Treatment D81
	TSDF only	/X/ Cont	ainers SOI	
	G-T		s S02/T01	Chemical/Physical/ Biological TO4
	G-TSDF	Surf	ace Impoundments SO4/TO2	/ / Groundwater Monitoring
	T-TSDF	Inci	neration/Thermal Treatment	
	G-T-TSDF	is-regularity		Post-Closure
			1-1	Revised 9/15/82

RCRA INTERIM STATUS INSPECTION FORM

PART 2. GENERATOR REQUIREMENTS

		ting. The company of the co	<u>Ye s</u>	<u>No N/A</u>	Remark #
1.	ack	hazardous waste(s) generated at this facility have been tested or are nowledged to be hazardous waste(s) as defined in Section 261 and in pliance with the requirements of Sections 262.11.	<u>X</u>		No. 1
2.	reg	s this facility generate any hazardous wastes that are excluded from ulation under Section 261.4 (statutory exclusions) or Section 261.6 cycle/reuse)?		X	• •
3.	fro or	s this facility have waste or waste treatment equipment that is excluded m regulation because of totally enclosed treatment (Section 265.1(c)(9)) via operation of an elementary neutralization unit and/or wastewater atment unit (Section 265.1(c)(10)).	X		No. 2
4.		generator meets the following requirements with respect to the preparation, and retention of the hazardous waste manifest:			1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
	a)	The manifest form used contains all of the information required by Section 262.21(a) and (b) and the minimum number of copies required by Section 262.22.	<u>X</u>		
·	b)	The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	X	Vaniralinia (vanirania)	• • • • • • • • • • • • • • • • • • •
	c)	Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	<u> </u>		· · · · · · · · · · · · · · · · · · ·
	d)	The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)	<u>X</u>		
	e)	Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	X		· · · · · · · · · · · · · · · · · · ·

RCRA INTERIM JATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS

1. Columbus Products has designated the following wastes as hazardous:

Listed Wastes: F002; Methylene Chloride and 1,1,1-Trichloroethane, both recycled by Solvent Resources Recovery.

U223; Toluene diisocyanate, any TDI which is out-of-date, off-spec and intended for discarde is didposed of at a permitted disposal facility.

Wastes identified in Subpart C by applying a knowledge of their hazard characteristic:

D001; obsolete paint, contracted to Systech Liquid Treatment Corporation for disposal.

D002 & D007; chromic acid sludge, also contracted to Systech Liquid Treatment Corporation for disposal.

D002; spent pickle liquor and spent chromic acid are neutralized prior to being discharged to the sanitary sewer.

- 2. The facility has an industrial wastewater treatment unit which processes the spent pickle liquor and spent chromic acid prior to discharge to the sanitary sewer of an NPDES permitted facility.
- 3. The generator should be able to provide the transporter with the appropriate placards prior to the transporting of their hazardous waste off-site.
- 4. Facility personnel must successfully complete a training program that will instruct them in the proper handling of hazardous waste. The Personnel Training Program must be in compliance with 40 CFR Part 265.16(a)(b)(c).
- 5. The records required by 40 CFR Part 265.16(d)(e) must be maintained at the facility.

RCRA INTERIM . . ATUS INSPECTION FORM

		<u>Ye s</u>	No	N/A	Remark #
	Subpart C: Preparedness and Prevention				
•	Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31)	: <u>4344_4-4-444</u>	X	*********	desired to the contract of the
2.	If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)				
	a) Internal alarm system.	X	COLUMN CONTRACTOR		*************
	b) Access to telephone, radio or other device for summoning emergency assistance.	X	·		e de la constante de la consta
	c) Portable fire control equipment.	<u>X</u>			
	d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers.	X			· · · · · · · · · · · · · · · · · · ·
3.	All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)	X	· · · · · · · · · · · · · · · · · · ·	water a	and the state of t
4.	If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34)	X			and the second s
5.	If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35)	X		· · · · · · · · · · · · · · · · · · ·	
6.	If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)	X			****
7.	Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)	· · · · · · · · · · · · · · · · · · ·		X	CONTRACTOR OF THE CONTRACTOR O

SUBPART D REMARKS

- 6. The Contingency Plan must include a list of the emergency equipment and be in compliance with 40 CFR Part 265.52(e).
- 7. The Contingency Plan must be revised when necessary as per 40 CFR Part 265.54.

PART 5. TREATMENT/STORAGE/DISPOSAL

SUBPARTS INCLUDED

I: J: K:	Management of Containers Management of Tanks Surface Impoundments	L: Waste Piles M: Land Treatmen N: Landfills	nt P Q	: Them	nerators mal Trea ical/Phy	tmen		logical	Treatment
		Subpart I: Manag	gement of Containers					POP-III-	ateirannas m—ad-ecdarandeva
						<u>/es</u>	No	N/A	Remark #
1.	Hazardous wastes are stored in	containers which are:							
	a) Closed (265.173)					X			·
	b) In good physical condition	(265.171)			œ	X	-		
	c) Compatible with the wastes	stored in them (265.17	72)			X			***************************************
2.	Containers are stored closed exwastes. (265.173(a))	ccept when it is necess	sary to add or remove	e	· ·	X		B=00-01-	distribution of the state of th
3.	Hazardous waste containers are which may rupture the container					X			
4.	The area where containers are s corrosion at least weekly and s						X		No. 8
5.	Containers holding Ignitable or (15 meters) from the property I such wastes in Section 265.17 (met (265.176).	line and the general re	equirements for hand	ling	· -	X			· .
6.	Containers holding hazardous wa which may interact with the was			S		X		STOCKET AND A	91130 - 110 1131 - 2 · · · · · · · · · · · · · · · · · ·

SUBPART I REMARKS

8. These inspections must be performed in compliance with 40 CFR Part 265.174.

Re:

Franklin County

OHD095030979

HWFAB 01-25-0505

RECEIVED

MAR 171992

Mr. Richard Huntington Senior Manufacturing Engineer Columbus Products Company 300 Phillipi Road Columbus, Ohio 43228 WASTE MANAGEMENT BRANCH EPA, REGION March 12, 1982

Dear Mr. Huntington:

On March 3, 1982, your facility was reinspected by the Ohio Environmental Protection Agency to determine if it was in compliance with Federal/State Interim Status Hazardous Waste Regulations promulgated under the Resource Conservation and Recovery Act (RCRA, Public Law 94-580).

The enclosed inspection report is elf-explanatory and contains recommendations for correcting the deficiencies found during the inpsection. This office requests that you provide a written response, within thirty days, to the following deficiencies/comments contained in the enclosed inspection report:

5-1 2 Management of	PAGE	QUESTION NUMBER	REQUIREMENT
Containers	4-2 4-4 4-5 4-8 4-10	6 2 1a - 1d	Employee Training Contingency Plan Operating Record Closure Plan Closure Cost Estimate

Please call (614-466-6450) if you have any questions regarding the inspection or RCRA regulations.

Sof Adelheyer Lundy J. Adelsherger

Environmental Scientist

Hazardous Materials

Central District Office

LJA/sc

Sincerely,

cc: Ms. Kathleen Homer, SIO, U.S. EPA, Region V

cc: Mr. Bob Fragale, Technical Permits Section, HWFAB, Ohio EPA, CO

cc: Ms. Paula Cotter, Inspections/Enforcement, DHM, Ohio EPA, C.O.

PART 1. GENERAL INFORMATION	U.S. EPA I.D. NO. OHD095030979
Facility: Columbus Products Company Address	ss: 300 Phillipi Road
City: Columbus State: Ohio Zip Code:	43228 Telephone: (614) 272-4000
Facility Operator: G.F. Diekman Title:	President Telephone: (614) 272-4000
Facility Owner: White Consolidated Industries Addre	ss: 11770 Berea Road
City: Cleveland State: Ohio	Zip Code: 44111 Telephone: (216) 252-3700
Type of Ownership: X Private Governm	ent State HWFAB No. <u>01-25-0505</u>
Date of Inspection: March 3, 1982 Time of	Inspection: (Start) 10:00 AM (Finish) 1:00 PM
Advance Notification? No X Yes: Telephone	2/22/82
Weather Conditions: Sunny - Cold	
	County: Franklin
INSPECTION PART	ICIPANT(S)
(Name)	(Title) (Telephone)
]. Mr. Richard Huntington Senior Manufac	turing Engineer (614) 272-4468
2.	
3.	
4.	

INSPECTOR(S)

	(Name)) (Title)	
1.	Mr. Lundy Adelsberger	Environmental Sceintist	614-466-6450
2.			
3.			(,
			Drivery was a second of the se
4.			
].	Type(s) of hazardous waste site activi	ty: A. X Generation B. X Sto	rage C. X Treatment
		D Transportation E	
2	Creatitie harandana waataa handlad at t		•
2.	Specific hazardous wastes handled at t		
	a) Listed Wastes: F002 (Methylen	e Chloride, 1,1,1-Trichloroethane),	
	K062 (Spent Pi	ckle Liquor)	
		·	
	b) Non-Listed Wastes: X I		
	b) Non-Listed Wastes: X D001	D002 C R E D004-D017	
	Obsolete Paint (Ignitable),	U223 (Toluenediisocyanate)	
			Mark to the second seco
3.	Has this facility submitted a Part A P	Permit Application? X Yes N	0
4.	Does this facility store, treat or dis	pose of any hazardous waste from any off-s	ite domestic sources?
	Yes, See Remark #	X No	

5.	Does this facility store, treat or dispose of any hazardous was	ste from any fore	ign sou	rces?	
	Yes, See Remark # X No			•	
5.	Does this facility transport hazardous waste materials off-site	e for itself or o	ther ge	nerators	?
	Yes, Complete Part 3 (Transp.) X No		·		
	a) P.U.C.O. Registration Number				
7.	A brief description of site activity:	Site Activity:	S		D
	The manufacture of refrigerators and dishwashers.	Containers	I X		
		Tanks Surf. Imp.	J K		
		Waste Pile			
		Land Treat.	M V		,
			0		
		THE THE TICKES	P		
		Chem/Phys/Biol Under. Inj.	0		
		OHUCI . III) .	11		

REMARKS, PART 1. (GENERAL INFORMATION)

PAR	PART 2. GENERATOR REQUIREMENTS								
			Yes	<u>No</u>	N/A	Remark #			
٦.	kno	hazardous waste(s) generated at this facility have been tested or are acwiledged to be hazardous waste(s) as defined in Sections 261 and 3745-51 in pliance with the requirements of Sections 262.11 and 3745-52-11.	X	**************************************	New Additional Confession of	pp			
2.	tio	s this facility generate any hazardous wastes that are excluded from regula- n under Sections 261.4 and 3745-51-04 (statutory exclusions) or Sections .6 and 3745-51-06 (recycle/reuse)?	X	V————————————————————————————————————					
3.	fro and	s this facility have waste or waste treatment equipment that is excluded m regulation because of totally enclosed treatment (Sections 265.1(c)(9) 3745-55-C-9 or via operation of an elementary neutralization unit and/or tewater treatment unit (Sections 265.1(c)(10) and 3745-55-C-10.	X		(Auditoria)	was been placed to the control of th			
4.	The use	generator meets the following requirements with respect to the preparation, and retention of the hazardous waste manifest:							
	a)	The manifest form used contains all of the information required by Sections $262.21(a)$, (b) and $3745-52-21-A-B$ and the minimum number of copies required by Sections 262.22 and $3745-52-22$.	X		· · · · · · · · · · · · · · · · · · ·	ggyggymilyan halandi de Fillman fedyddiol y diwllon			
	b)	The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Sections 262.20 and 3745-52-20.	X		, tillo	news and a second second			
	c)	Prepared manifests have been signed by the generator and initial transporter in compliance with Sections 262.23 and 3745-52-23.	X	NATIONAL TO THE	<u></u>				
	d)	The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Sections 262.42(a), (b) and 3745-52-42.	X	######################################	distributable (TO)	International Communication			
	e)	Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Sections 262.40 and 3745-52-40.	X	EDSP-SECHWINNEYS	ww/sia/60*7725/05*4	germald armount of a substitute of the substitut			

		<u>Yes</u>	<u>No</u>	N/A	Remark #
5.	The generator meets the following hazardous waste pre-transport requirements	0			
i	a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a) and 3745-52-30, 52-31, and 52-32-A).		provide library	\$4000-POLICES	
1	b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Sections 262.32(b) and 3745-52-32-B.	m-	@10	hand the add opening is	
l	c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Sections 262.33 and 3745-52-33.	X			taka taun salah salah salah salah salah salah salah salah salah salah salah salah salah salah salah salah salah
6.	The generator meets the following recordkeeping and reporting requirements:				
, ,	a) The generator has submitted an annual report for all hazardous waste shipped off-site as required by Sections 262.41(a) and 3745-52-41-A-B.	B+s+CEXX+CEXXFCFFFC		Х	statement of the state of the s
!	b) The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Sections 262.41(b) and 3745-52-41-C and in compliance with Sections 265.71 and 3745-55-71, when applicable.	to-dilikkazaren		X	
7.	Hazardous wastes imported from or exported to foreign countries are handled accordance with the requirements of Sections 262.50 and 3745-52-50.	in		X	
•	If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Sections 262.34 and 3745-52-34, the following requirements with respect to such storage are met:			X	·
•	a) Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.	BONGE AAARONING ANTIN		X	gyr 1954 52 EV lorg von yn mwyg gygynnad blanfol

		Yes	No	N/A	Remark #
b)	The date that accumulation began is clearly marked on each container.			<u> </u>	Charles Annual Control of the Contro
c)	The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	<u></u>	пистамот	X	·
d)	Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line (Sections 265.176 and 3745-56-56), and the general requirements for handling such wastes in Sections 265.17 and 3745-55-17 (physical separation, signs and safety) are met.		······································	X	Employee or the second of the second
e)	Tanks: the tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 56-72-B and are equipped with a waste-feed cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	\$75541		X	
f)	Uncovered tanks have at least 2 feet (60 cm.) of freeboard <u>unless</u> they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	Name of Control (Control	1 ,500,000 .	X	
g)	Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74-A-B-C).	BANKER ANNERS SECTOR	NA NEWSTRANSPORT	X	AND AND AND A STREET OF THE STREET
h)	Weekly inspections are made of all tank construction materials and containment structures (265.194 and $3745-56-74-D-E$).	***************************************		<u>X</u>	
tio mer	e generator has provided a Personnel Training Program in compliance with Sec- ons 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equip- nt operation and emergency response procedures, training new employees within				
	months and providing an annual training program refresher course (Sections 2.34 and 3745-52-34).			X	ec-becombelliss
374	generator keeps all of the records required by Sections 265.16(d)(e) and 45-55-16-D-E including written job titles, job descriptions and documented bloyee training records (Sections 262.34 and 3745-52-34).	•••• •		<u> </u>	

9.

10.

		Yes	No	N/A	Remark #
]].	Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of (Sections 265.197 and 3745-56-77) as referenced in Sections 262.34 and 3745-52-34.	<u> 2020 - </u>		X	

SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND 3745-55-30 THRU 37 AND 3745-55-50 THRU 70 BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER PART 4 - GENERAL INTERIM STATUS REQUIREMENTS.

REMARKS, PART 2. GENERATOR REQUIREMENTS

PAR	T 3. TRANSPORTER REQUIREMENTS	<u>, ,,, , ,, ,, ,, ,, ,, ,, ,, ,, ,, ,, ,</u>			
<u></u>		<u>Yes</u>	<u>No</u>	<u>N/A</u>	Remark #
+	The transporter has not transported any hazardous wastes without having first received a U.S. EPA Identification Number and registering with the Public Utilities Commission of Ohio. (263.11 and 3745-53-11).			. <u>X</u>	
2.	The transporter has not accepted any hazardous wastes for transport unless the waste was accompanied by a manifest prepared by the generator in accordance with Sections 262 and 3745-52.			X	Committee of the State of the S
3.	The transporter has signed the manifest as required by Section 263.20(b) and 3745-53-20-B and has carried the manifest with the waste shipment as required by 263.20(c) and 3745-53-20-C.			X	and the second s
4.	Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20 (d) and 3745-53-20-D and has retained a signed copy (available for inspection) for at least 3 years (263.22(a) and 3745-53-22-A).			X	
5.	The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21 and 3745-53-21).			X	
6.	If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Sections 263.20(e)(f) and 3745-53-20-E-F.	وهسفنسيونس		X	general Proposition of the State Control of the Sta
7.	If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) and 3745-53-22-C).		<u></u>	X	
8.	that a discharge of hazardous waste during time that	<u></u>	n a u	X	poer and the second sec
	a) Was immediate action taken? (Notify authorities, dike discharge) (263.30 (a) and 3745-53-30-A).		eds destablishmen	X	- wygory - de reger dans tradition

			<u>Yes</u>	NO	N/A	Remark #
	b)	Were all of the notifications required by Sections 263.30(c)(d) and 3745-53-30-C-D made?			<u>X</u>	Andreaster Color - The Color -
	c)	Was the discharge cleaned up as required by Sections 263.31 and 3745-53-31?		*	X	Calabella Company of the Control of
9.		s the transporter store hazardous wastes temporarily while they are in nsit?			X	One brigger & Colorador and Co
	a)	Manifested wastes are not stored for longer than 10 days ("Transfer Facility") and remain properly DOT-packaged during storage. (263.12 and 3745-53-12)	************************************	««««»««« »»	<u>X</u>	was addressed at a other and a social area of the
NOT		TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILIT STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS R FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY 263.12, TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.	EQUIRE	MENTS	FOR ST	ORAGE
0.	Doe	s the transporter import hazardous waste into the United States?			X	man-sustain to the sustain the
١.		s the transporter mix hazardous wastes of different U.S. DOT shipping de- iptions by placing them into a single container?			X	,

NOTE: A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTIONS 263.10(c) AND 3745-53-10-C BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTIONS 262 AND 3745-52.

REMARKS, PART 3. TRANSPORTER REQUIREMENTS

			•	-	
PAR	T 4. GENERAL INTERIM STATUS REQUIREMENTS			waanaa	ACCOMMUNICATION OF THE PARTY OF
	SUBPARTS INCLUDED				
B: C: D:	Preparedness and Prevention F: Ground Water Monitoring	Finar	ncial	Require	ements
	Subpart B: General Facility Standards				
		<u>Yes</u>	No	N/A	Remark #
Ϊ.	The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	X		Quantum dd	
2.	The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Sections 265. 13(b) and 3745-55-13-B).	X			processor for the second of th
3.	If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).				
	a) 24 hour surveillance system.	X			eyeary, a hydro Abbasheri
	 b) Artificial or natural barrier completely surrounding the active portion of the facility. 	X	<u>arazama awa</u>		congress, solves 44 550 cm
	c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	X			Pricez-CASSE-ISBNO
	d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	<u> x</u>	Black and a second		

		Yes	<u>No</u>	N/A	Remark #
4.	The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. The plan includes the following elements: (Sections 265.15 and 3745-55-15)		X	ded filescone comp	
	a) Inspect emergency equipment.	X	describertos	·	<i>au</i>
	b) Inspect monitoring equipment.	X		***************************************	_ AAAAAN AAAAAAAAAA
	c) Inspect security, alarm and communications devices.		<u>X</u>		No. 1
	d) Inspect process equipment (pipes, pumps, etc.).	X		**************************************	#### # ### **
	e) Inspect containment structures (dikes, curbs, etc.).	X	V-00704-F720+G00	******	
	f) Inspect facility for structural malfunctions (roof, floor, etc.).		X		No. 2
ı	g) Inspect hazardous waste handling/loading areas each day used.	a	X	4	No. 3
	h) Record of any malfunctions due to equipment or operator errors.	X		,	WHEN SHOW IN THE
	i) Record of any hazardous waste discharges.	<u>X</u> .		·	
5.	The facility has provided a Personnel Training Program in compliance with Sections $265.16(a)(b)(c)$ and $3745-55-16-A-B-C$ including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.	X		C	
6.	The facility keeps all records required by Sections 265.16(d)(e) and $3745-55-16$ D-E including written job titles, job descriptions and documented employee training records.	n- 	X		No. 4
7.	If required due to the actual hazards associated with Ignitable, Reactive or in compatible waste materials, the facility meets the following requirements (Sections 265.17 and 3745-55-17).	X Edward-Agraella		South States	and the state of t

			<u>Yes</u>	<u>No</u>	<u>N/A</u>	Remark #
	a)	Protection from sources of ignition.	X	Commence of the Commence of th		**************************************
	b)	Physical separation of incompatible waste materials.	X	**************************************		<u> </u>
	c)	"No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	X		Charles (Springer)	,
	d)	Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	BH64755***********************************	White and the second	<u>X</u>	
		Subpart C: Preparedness and Prevention				
1.	Has thi	there been a fire, explosion or non-planned release of hazardous waste at s facility? (265.31 and 3745-55-31).	Descriptions	X	***************************************	DANGER PROPERTY OF THE PROPERT
2.		required due to actual hazards associated with the waste material, the fa- ity has the following equipment: (265.32 and 3745-55-32).	X RANGO-VARIOUS		10.000	- AMARON ANDONOMIA
	a)	Internal alarm system	X		Openius de la companya del companya del companya de la companya de	· · · · · · · · · · · · · · · · · · ·
	b)	Access to telephone, radio or other device for summoning emergency assistance.	X		to PEER TVEE TVEE TE	got vyst.
	c)	Portable fire control equipment.	X		Manifoldskammanla	
	d)	Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	X		KOOPPERSTORMEN	·
3.		required safety, fire and communications equipment is tested and maintained necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	X	Shreidens		,
4.	son	required due to the actual hazards associated with the waste material, per- nel have immediate access to an emergency communication device during times n hazardous waste is being physically handled (Sections 265.34 and 3745-55-	X			ч ерда анда ститу

		<u>Yes</u>	No	N/A	Remark #
5.	If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained (265.35 and 3745-55-35).	X	(MORESTANDONE)		
6.	If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a) and 3745-55-37-A).	X		winds 1477-rel(3)	17-1409-9744408
7.	Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-B).	BOARTY I		X	100-000-0700-00000
	Subpart D: Contingency and Emergency				
1.	The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745-55-51) and contains the following components:	X	оснания:		, , ,
	a) Actions to be taken by personnel in the event of an emergency incident.	X	******************************	and With the control of the control	**************************************
	b) Arrangements or agreements with local or state emergency authorities.	X	-		- 44-605-W65-W67-W69-
	c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	X	Electric County	-	
	 d) A list of all emergency equipment including location, physical description and outline of capabilities. 	<u>X</u>		***	
	e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-F).	X			
2.	A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265. 53 and 3745-55-53).		X	,	No. 5

			<u>Yes</u>	<u>No</u>	<u>N/A</u>	Remark #
3.	The plan is revised in response to facility, equipment and personnel change failure of the plan (265.54 and 3745-55-54).	s or	X	CONTRACTOR OF THE PROPERTY OF		EMISSOCIETY ON AND MAINTING PROPERTY.
4.	An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 26 55 and 3745-55-55).	S	X	aladis A CODINGS	·	
5.	If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56 and 3745-55-56.	-			X	······································
	Subpart E: Manifests/Records/Reporting					
NOT	TE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TO FACILITIES.	REATME	NT,	STORAGE	E AND I	DISPOSAL
		,	<u>Yes</u>	No	N/A	Remark #
1.	The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:			X		No. 6
	a) Description and quantity of each hazardous waste treated, stored or dis posed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).			X		No. 6
	 b) Common name, EPA Hazardous Waste Identification Number and physical sta (liquid, solid, gas) of the waste(s). 	te		X		No. 6
	c) The estimated (or actual) weight, volume or density of the waste mate- rial(s).			X	,	No. 6
	d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).			X	CMATE HIGH RECORD	No. 6

			Yes	<u>No</u>	<u>N/A</u>	Remark #
	e)	The present physical location of each hazardous waste within the facility.	X		everancement	<u> </u>
	f)	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).	\$0		X	School Service
	g)	Records of any waste analyses and trial tests required to be performed.	<u>X</u>			who had been also to the second secon
	h)	Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B).	· · · · · · · · · · · · · · · · · · ·	*******************************	X	60-7
	i)	Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.		Chierochie (Service	<u>x</u>	quaggarings in open and the sales and the sales
	j)	Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34.	***************************************		<u>X</u>	±41000000000000000000000000000000000000
	por	operator has submitted an annual Treatment-Storage-Disposal Operating Ret (by March 1) containing all of the operating information required under tions 265.75 and 3745-55-75.			X	
ΙΟΤ		THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS 3745-52-41.	UNDER	SECTI	ONS 26	2.41 AND
	was	n applicable, the operator has submitted reports on releases of hazardous tes, fires, explosions, groundwater contamination data and facility closure 5.77 and 3745-55-77).		, , , , , , , , , , , , , , , , , , ,	X	NEW MARKETON TO THE PARTY OF TH
IOT	E:	THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE	AND I	OTSPOS	AL FAC	ILITIES.
						
٠.	the	ifests received by the facility are signed and dated; one copy is given to transporter, one copy is sent to the generator within 30 days and one copy kept for at least 3 years (Sections 265.71 and 3745-55-71).	E-A-VENE	-	X	A WENT WITH THE PERSON WAS A STATE OF THE PE

			<u>Yes</u>	No	<u>N/A</u>	Remark #
	a)	If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met (265.71(b) and 3745-55-71-B).	·	alamin-4400007A	X_	SI SO - MAN AND AND AND AND AND AND AND AND AND A
	b)	Any significant discrepancies in the manifest, as defined in Sections $265.72(a)$ and $3745-55-72-A$, are noted in writing on the manifest document (Sections $265.71(a)(2)$ and $3745-55-71-A-2$).			X	
5.	Sec:	manifest discrepancies have been reconciled within 15 days as required by tions 265.72(b) and 3745-55-72-B or the operator has submitted the required primation to the Regional Administrator/Director.			X	www.dowestown
6.	sour posa Sec	the facility has accepted any unmanifested hazardous wastes from off-site rces (except from small quantity generators) for treatment, storage or disal an unmanifested waste report containing all the information required by tions 265.76 and 3745-55-76 has been submitted to the Regional Administrator/ector within 15 days.	aucon		X	
		Subpart F: Groundwater Monitoring				
тои		THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND AND AFTER NOVEMBER 19, 1981.	TREA	TMENT	FACILIT	IES ON
			Yes	<u>No</u>	<u>N/A</u>	Remark #
ॏ.	spe	facility has implemented one or more of the following alternatives with re- ct to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745- 90-A:				
	a)	A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94.		1027-17	X	

			<u>Yes</u>	NO	N/A	Remark #
	ь)	A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.		х инажело-то-	X 10	
	c)	An alternate Groundwater Monitoring System Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D.	, accommonde	erosudokul (Suulõõ	X	Service Address and Address an
		Subpart G: Closure and Post-Closure				
NOT	Έ:	THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL	FACILI ⁻	TIES:		
			<u>Yes</u>	No	N/A	Remark #
1.		ritten Closure Plan is on file at the facility and contains the following ments: (Sections 265.112 and 3745-56-03)	· · ·	X	phid SERVICES TO SERVICES	No. 7
	a)	A description of how and when the facility will be closed (265.112(a)(1) and $3745-56-03-A-1$).	X	110-10-1000-0-00	<u></u>	· · · · · · · · · · · · · · · · · · ·
	b)	A description of how any of the applicable closure requirements in other Subparts of Sections 265 and $3745-55,-56,-57,-58$ (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.	•		X	
	c)	An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility.	X	West Share decreased?		
	_d)	A description of steps taken to decontaminate facility equipment.	X	*******		-
	e)	The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed.	, servense Arnah essa	X		No. 7
2.		Closure Plan has been amended within 60 days in response to any changes in ility design, processes or closure dates.	 	**************************************	X	mandal Switch (1974) of Section 1974 and 1974 an

	en de la companya de la companya de la companya de la companya de la companya de la companya de la companya de La companya de la co	<u>Yes</u>	<u>No</u>	N/A	Remark #
3.	The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	envelokelinetski	p	X	Backetty/ava-walk/streety-y
4.	If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.		VASTES/VOTES/TO	X	
	a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	,		X	
	b) Upon completion of Closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).	goods Creek		X	
	c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).			X	REALITY HOUSE BETTER THE STATE OF THE STATE
пол	TE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.				
5.	A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	·	ded (Construction)	X	delphyseconimized (2-11
6.	The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	,	·	<u>X</u>	· · · · · · · · · · · · · · · · · · ·
7.	The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.		envyjestaniska	X	Majoracy and State of Majoracy years of the Stat
8.	The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.			X	

9. The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10.

Subpart H: Financial Requirements

1. A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32).

NOTE: REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL APRIL 13, 1982 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME.

REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

- 1. The inspection of security, alarm and communications devices must be documented as required by 265.15(d).
- 2. The operating record must contain a documented inspection of the facility for structural malfunctions.
- 3. Hazardous waste handling/loading areas must be inspected each day they are used and the inspection must be documented in the operating record log.
- 4. The Operator Training Program record must contain a job description for each employee as well as documented employee training dates.
- 5. A copy of the Contingency Plan must be submitted to all local police departments, fire departments and hospitals.
- 6. The operating record must contain an up to date description and quantity of each hazardous waste treated, stored or disposed of including EPA Hazardous Waste Identification Numbers (FO-) and EPA Handling Codes (SO-) as required by 265.73.
- 7. The Closure Plan must contain an estimate of the expected year of closure or the statement "This facility does not intend to close".
- 8. The Closure Plan must have a written estimate of the costs of closing the facility as required by 265.142.

PAR	RT 5. TREATMENT/STORAGE/DISPOSAL	 			
	SUBPARTS INCLUDED	 -			
Ĭ: J: K:	Management of Tanks M: Land Treatment P: Therm	erators al Treatmen cal/Physica		jical	Treatment
	Subpart I: Management of Containers	**************************************	<u> </u>		}
		<u>Yes</u>	<u>No</u>	N/A	Remark #
٦.	Hazardous wastes are stored in closed containers which are in good physica condition and are compatible with the wastes stored in them (Sections 265. 171, .172, .173 and 3745-56-51,-52-53).	1 <u>x</u>	Salah Zalah Palaminas	ever-	**************************************
2.	The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	Autro-middeline	X	⇔anunosa	No. 9
<u>TON</u>	FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TRUNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REQUIRED. (SECTIONS 262 AND 3745-52)	ANSPORT LAB OUIRED TO AF	ELING RE FIX AN A	EQUIRE NCCUMU	MENTS JLATION
		Yes	<u>No</u>	N/A	Remark #
3.	Containers holding Ignitable or Reactive waste(s) are located at least 50 (15 Meters) from the property line and the general requirements for handli such wastes in Sections 265.17 and 3745-55-17-B (physical separation, sign and safety) are met (265.176 and 3745-56).	ng	entalement of the second		
4.	Incompatible waste materials are not placed in the same containers or put contaminated containers unless it is done under completely controlled and conditions as specified in Sections 265.17(b) and 3745-55-17-B (Sections 2177(a), (b) and 3745-56-57-A-B).	safe	مادان س يبيو	Name of Contract o	

		<u>Yes</u>	<u>No</u>	N/A	Remark #
5.	Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C).			X	
	Subpart J: Storage in Tanks				,
1.	The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-B and are equipped with a wastefeet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-D.	. المستقالة الشبيعي	Geography		T Canada
2.	Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-C).	:	67 18 1920 -	- MOODE	en
3.	Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74).	· · · · · · · · · · · · · · · · · · ·			
4.	Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).	44500007400000	, , , , , , , , , , , , , , , , , , ,	gy angan, ,	ment did dell'il liment to resident the second seco
5.	Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A).		est-acc-moderature		· · · · · · · · · · · · · · · · · · ·
	a) A complete waste analysis plus bench scale tests or pilot tests were con- ducted prior to implementing the proposed changes and all data is on file in the facility operating record.	provingo-ampaign		·	
	b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	97.exercitoristes	gove sony, w ila	Habitan and the second	, had a second control of the second control

REMARKS, PART 5, (TREATMENT/STORAGE/DISPOSAL)

9. The hazardous waste drum storage area must be inspected weekly and this inspection must be documented as required by 265.174.



: Franklin County OHD095030979

Mr. Richard L. Huntington Senior Manufacturing Engineer Columbus Products Company 300 Phillipi Road Columbus, Ohio 43228 May 5, 1987

Dear Mr. Huntington:

The Ohio Environmental Protection Agency is cooperating with the U.S. EPA Region V in carrying out the provisions of the Resource Conservation and Recovery Act of 1976 (RCRA) Public Law 94-580. In this effort personnel of the Ohio EPA are conducting inspections of facilities in Ohio that are engaged in the generation, transportation, storage, treatment or disposal of hazardous waste materials.

SECTION 262, GENERATOR REQUIREMENTS

1. A shipment of waste solvent (methylene chloride and 1,1,1,-trichloroethane) was shipped to a solvent reclaimer during February of 1981. Because these solvents are listed under EPA Hazardous Waste Category No. F002, the storage and transportation prior to reclamation is fully regulated as per Section 261.6(b). The shipping paper provided by Solvent Resource Recovery lacked the U.S. EPA identification numbers of the generator and the transporter and therefore did not contain all of the information required to be on a hazardous waste manifest by Section 262.21(a).

SECTION 265, SUBPART B (GENERAL FACILITY STANDARDS)

- 1. A written waste analysis plan, as required by Section 265.13(b) was not available. It was noted that frequent chemical analysis of the K062 pickle liquor is part of standard shop procedure and that the waste methylene chloride and 1,1,1,-trichloroethane solvents have properties which are essentially identical to virgin material.
- 2. "Danger-Authorized Personnel Only" signs required by Section 265.14(c) were not posted in the immediate vicinity of the hazardous waste storage area.
- 3. No special arrangements have been made to incorporate the employee training requirements of Section 265.16 into the existing employee training program. The present training program instructs in the safe handling of solvents as raw material rather than waste materials, and may only need minor modification and some additional recordkeeping to be in compliance.

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- 4. The waste storage area and raw material storage area are located next to each other and may require the physical separation of incompatible materials as specified in Section 261.17.
- 5. If ignitable waste materials will be stored in the hazardous waste storage area, "No Smoking" "No Open Flames" signs are required under Section 261.17.

SECTION 265, SUBPART D (CONTINGENCY AND EMERGENCY)

- The existing Contingency Plan specifies personnel to be contacted, but not all of these people would meet the minimum requirements of the Emergency Coordinator required by Section 265.51. The designated RCRA Emergency Coordinator should be specifically identified.
- 2. The existing plant evacuation plan does not specifically address the storage of hazardous waste as required by Section 265.51(f).

SECTION 265, SUBPART I (MANAGEMENT OF CONTAINERS)

1. The area where containers are stored is not being formally checked for leaks and corrosion at least weekly as required by Section 265.174. Personnel working in the general area presently make informal daily checks.

A copy of this, letter and the inspection report will be sent to the U.S. EPA Region V Office in Chicago. Any enforcement action related to this inspection will be initiated by U.S. EPA's Enforcement Division; in that case U.S. EPA will contact you. If you have any questions, please contact me (614-466-6450) or Ms. Brenda Lillstrom (312-353-3899) of the U.S. EPA, Region V.

Sincerely,

Kennth L. Humphrey

Hazardous Waste Scientist Central District Office

KLH/sc

cc: Franklin County Health Department

Humphrey

cc: Mr. Don Day, Chief, OLPC, C.O.

cc: Mr. Steve White, Acting Chief, OHM, C.O. cc: Ms. Brenda Lillstrom, U.S. EPA, Region V

INSPECTOR(S)

		(Name)	(Title)	(Telephone)
1.	Ker	n Humphrey, Ohio EPA	Hazardous Waste Scientist	614-466-6450
2.			Y	
3.		· · ·		
4.		enterente de la companya del la companya de la comp	weeks and the state of the stat	
т.				
1.	Туре	e(s) of hazardous waste site	activity:	
	Α.	X Generation B.	X Storage C.	X Treatment
	D.	Disposal E.	X Off-Site Transportati	ion
2.	Spec	cific hazardous wastes handle	•	
	a)	roethane),		
		KO62 (Spent Pickle Liquor),		
		and the second s		
		The state of the s		
		· ·		·
	ь \ ь \	Non-Listed Wasters V T		
	b)	Non-Listed Wastes: X I D001	C R D003	D000
		Obsolete Paint (Ignitable) :	See Remark No. 1	
3.	Has	this facility submitted a Pa	rt A. Permit Application?	X Yes No
4.	Doe:	s this facility store, treat- -site domestic sources?	or dispose of any hazardous	s waste from any
	•	Yes, See Remark #	X No	

5.	Does this facility store, treat or dispose of any hazardous waste from any foreign sources?
	Yes, See Remark # X No
6.	Does this facility transport hazardous waste materials off-site for itself or other generators?
	Yes, Part 263 applies X No
•	a) Applicable U.S. EPA I.D. Number
	b) Ohio P.U.C.O. GR TRSF Number
	REMARKS, PART 1. GENERAL INFORMATION
N	o. 1 Columbus Products is presently storing on-site about 17-20 drums of

obsolete toluenediisocyanate and some obsolete unused paint; both of these materials are regarded as usable raw materials at this time, but may become waste materials at some point in the future. Since these materials are not now wastes, their storage is not subject to regulation under RCRA.

PAR	T 2.	GENERATOR REQUIREMENTS (Section 262)		<u> </u>		
			Yes	No	N/A	Remark #
process 6	ity haza	hazardous waste(s) generated at this facil- have been tested or are acknowledged to be rdous waste(s) as defined in Section 261 in liance with the requirements of Section 11.	X			
2.	wast unde	this facility generate any hazardous tes that are excluded from regulation exclusions 261.4 (statutory exclusions) 261.6 (recycle, reuse)?	X			No. 1
3.	equi caus 265. tary	this facility have waste or waste treatment pment that is excluded from regulation bese of totally enclosed treatment (Section .1(c)(9)) or via operation of an elementy neutralization unit and/or wastewater atment unit (Section 265.1(c)(10))?	X			No. 2
4.	with	generator meets the following requirements n respect to the preparation, use and re- tion of the hazardous waste manifest:				
*	a)	The manifest form used contains all of the information required by Section 262.21(a), (b) and the minimum number of copies required by Section 262.22.		<u>X</u>	· · · · ·	No. 3
	b)	The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20.	X			•
	c)	Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.	Х		· · · · · · · · · · · · · · · · · · ·	
	d)	The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b).			<u> </u>	
	e)	Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.	<u> </u>			

•	٠		<u>Yes</u>	1	N/A	Remark #
5.	The wast	generator meets the following hazardous e pre-transport requirements:	·			
	a)	Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked accordance with applicable DOT regulations (Sections 262.30, 262.31 and 262.32(a)).	<u>X</u>			
	b)	Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 Liters) or less is affixed with a completed hazardous waste label as required by Section 252.32(b).	X			
. *	c)	The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33.	<u>X</u>			
6.	The kee	generator meets the following record- ping and reporting requirements:	÷		•	
	a)	The generator has submitted an annual report for all hazardous waste shipped offsite as required by Section 262.41(a).			<u>X</u>	
	b)	The generator has submitted an annual report for all hazardous waste treated, stored or disposed of on-site as required by Section 262.41(b) and in compliance with Section 265.71, when applicable.			X	
7.	for	cardous wastes imported from or exported to reign countries are handled in accordance the requirements of Section 262.50.		· .	<u> </u>	······································
8.	was day as lov	the generator elects to store hazardous ste on-site in containers or tanks for 90 ys or less without a RCRA storage permit provided under Section 262.34, the folwing requirements with respect to such orage are met:			X	
	a)	Containers: the waste is stored in closed containers which meet all applicable DOT pre-transport requirements for packaging, labeling and marking.		· ·	X	

			Yes	No	N/A	Remark #
	b)	The date that accumulation began is clearly marked on each container.		-	X	
	c)	The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174).			<u>X</u>	
	d)	Containers holding ignitable or reactive waste(s) are located at least 50 feet (15 Meters) from the property line, and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).			X	
	e)	Tanks: the tank(s) are operated in com- pliance with the safety requirements of Section 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or by- pass system as required in Section 265.192 (d).			X	
	f)	Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192(c)).			<u>X</u>	
	g)	Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).			X	
	h)	Weekly inspections are made of all tank construction materials and containment structures (265.194).	स्थापका सम्बद्धान		<u>X</u>	
9.	Pro (c) ope tra vid	generator has provided a Personnel Training gram in compliance with Section 265.16(a)(b) including instruction in safe equipment eration and emergency response procedures, ining new employees within 6 months and proling an annual training program refresher arse. (Sec. 262.34)			<u>X</u>	
10.	by tit	e generator keeps all of the records required Section 265.16(d)(e) including written job cles, job descriptions and documented employee ining records. (Sec. 262.34)			<u>X</u>	

Yes

No

N/A

Remark #

		 		
η.	Whenever a tank is permanently taken out of service or upon closure of the facility all hazard-			
-	ous wastes and residues are removed and properly disposed of (Section 265.197). (Sec. 262.34)		X	

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) BE MET. COMPLETE THESE SECTIONS OF THE INSPECTION FORM UNDER "PART 3 - GENERAL INTERIM STATUS REQUIREMENTS (SECTION 265)."

REMARKS, PART 2. GENERATOR REQUIREMENTS

No. 2 The KO62 (spent pickle liquor) waste material is neutralized in a totally enclosed treatment system as defined in Sect-on 260.10(a)(70). The treated effluent is disposed of via the Columbus City Sewer System. This waste material and waste treatment equipment is exempted from RCRA regulation under Section 265.1(c)(9).

Columbus Products also has equipment for redistilling methylene chloride on site. This treatment equipment is connected by pipe to an industrial production process and is located indoors. When used in this mode, the redistillation equipment could be considered to be totally enclosed and therefore exempt from regulation as defined in Section 265.1. The redistillation equipment can also be used in a manual mode, with storage of the waste methylene chloride prior to treatment; when used in this manner the process may require a RCRA treatment permit and may be subject to the regulatory requirements of Section 265 during the interim status period. The methylene chloride redistillation equipment was not in use at the time of the inspection.

No. 3 Only one shipment of regulated hazardous waste has been shipped off-site since November 19, 1980 which was a load of drummed methylene chloride and 1,1,1-trichloroethane solvents sent to a reclaimer. Because of confusion of the part of the shipper and the receiver in regard to the regulatory status of these solvents under Section 261.6, a shipping paper provided by Solvent Resource Recovery was used in place of a hazardous waste manifest. The shipping paper contained most of the information required to be on a hazardous waste manifest by Section 262.21(a), but lacked the U.S. EPA identification number of the generator and the transporter. Because these solvents are listed under Hazardous Waste Category No. FOO2, their storage or transportation prior to reclamation is fully regulated as per Section 261.6(b).

PART 3. GENERAL INTERIM STATUS REQUIREMENTS (Section 265)

SUBPARTS INCLUDED

1.	Subpart	B:	General	Facil	ity	Standards
						Drawantiar

Subpart C: Subpart D: Subpart G: Preparedness and Prevention
Contingency and Emergency
Closure for Non-Disposal Facilities

	Subpart B: General Facility St	andaro	<u>is</u>		
•		<u>Yes</u>	<u>No</u>	N/A	Remark #
. The era B:	facility meets all requirements under Gen- l Facility Standards in Section 265, Subpart				
a)	The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sec. 265.13(a)(1).	<u>X</u>	Quantitation of the Control of the 		
b)	The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste (Section 265.13(b)).	•	X	· .	No. 4
c)	If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Section 265.14).				
	1. 24 hour surveillance system.	<u>X</u>			B
	 Artificial or natural barrier com- pletely surrounding the active por- tion of the facility. 	<u> X</u>			
	 Controlled entry (gates, monitors) to the active portion of the facil- ity at all times (265.14(2)(ii)). 	X			· · · · · · · · · · · · · · · · · · ·
	 "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c)). 	:	<u>X</u>		No. 5

KUKA INTEKTI STATUS INSPECTION FURIT

			<u>Yes</u>	Nu	N/A	Remark #
d)	pred docu any reco	operator must develop and follow a com- nensive, written inspection plan and must ument the inspections, malfunctions and remedial actions taken in an operating ord log which is kept for at least three				
	yean men	rs. The plan includes the following ele- ts: (Section 265.15)			<u>X</u>	No. 2
	1.	Inspect emergency equipment.		·	<u>X</u>	
	2.	Inspect monitoring equipment.			<u> X</u>	
-	3.	Inspect security, alarm and communications devices.	Company of the Control of the Contro		<u>X</u>	
-	4.	<pre>Inspect process equipment (pipes, pumps, etc.).</pre>			<u> X</u>	
	5.	Inspect containment structures (dikes, curbs, etc.).			X	
	6.	Inspect facility for structural malfunctions (roof, floor, etc.).	- -	 	<u> </u>	
÷	7.	Inspect hazardous waste handling/loading areas each day used.	· · · · · · ·		<u>X</u>	· · · · · · · · · · · · · · · · · · ·
	8.	Record of any malfunctions due to equipment or operator errors.			<u>X</u>	
	9.	Record of any hazardous waste discharges.		*****	<u>X</u>	**************************************
e)	ing (a) mer dur	e facility has provided a Personnel Train- p Program in compliance with Section 265.16 (b)(c) including instruction in safe equip nt operation and emergency response proce- res, training new employees within 6 months I providing an annual training program re-) ra			
		esher course.		<u>X</u>		No. 6
f)	Sec ti	e facility keeps all records required by ction 265.16(d)(e) including written job tles, job descriptions and documented ployee training records.	· · · · · · · · · · · · · · · · · · ·	<u> </u>		No. 6

		,	Yes	ν̈́	N/A	Remark #	
g)	If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the						٠
•	facility meets the following requirements (Section 265.17):			<u>X</u>		No. 7	
	1. Protection from sources of ignition.		X				
	 Physical separation of incompatible waste materials. 			<u> X</u>		No. 7	
	"No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.			<u>X</u>		No. 8	
	 Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). 				<u> </u>		
						•	
	REMARKS, SEC. 265, SUBPART	ГВ					

A written waste analysis plan for the FOO2 solvents was not available. The methylene chloride and 1,1,1,-trichloroethane generated at the facility come from well-known processes that are not likely to change significantly.

Columbus Products frequently tests the waste KO62 pickle liquor in order to properly treat it; this is done on a routine basis and not as a result of a written RCRA waste analysis plan.

- The Columbus Projects Facility is very large and has many controlled-access entry gates, not all of which are equipped with "Danger, Authorized Personnel Only" signs. Once inside the facility, the indoor hazardous waste storage area is accessible through numerous entryways. Posting the required signs at strategic locations on the three open sides of the waste storage area is recommended.
- No special arrangements have been made to incorporate the training requirements of the RCRA regulations into the existing Employee Training Program, which is geared toward OSHA requirements. Employees are presently trained to properly handle hazardous raw materials, rather than as waste materials.
- No. 7 The waste storage area and raw material storage area are located in the same general area of the facility. Both waste materials and raw materials are stored in closed containers on wooden pallets, but the various types of materials are not physically separated by appreciable distance or barriers. Physical separation of waste materials and raw materials, which could create a hazard if leaks should occur simultaneously, is recommended.
- "No Smoking/No Open Flames" signs are recommended for the waste/raw material storage areas used to store ignitable materials.

Subpart C: Preparedness and Prevention

	-			<u>Yes</u>	<u>No</u>	N/A	Remark #
2.	Pre	oarec	lity meets all requirements for Iness and Prevention in Section opart C:				
	a)	plar	there been a fire, explosion or non- nned release of hazardous waste at this ility? (265.31)	***************************************	<u>X</u>		No. 9
	b)	ated	required due to actual hazards associ- i with the waste material, the facility the following equipment: (265.32)	_X_			
		1.	Internal alarm system.	<u>X</u> :	-	,——	The state of the s
		2.	Access to telephone, radio or other device for summoning emergency assistance.	X	· ·		and the second s
		3.	Portable fire control equipment.	<u>X</u>	***************************************		granded where the till the majority was to be delivered.
		4.	Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	<u>x</u>			
	c)	tio as	required safety, fire and communica- ons equipment is tested and maintained necessary; testing and maintenance are umented.	X	·		No. 10
	d)	soc hav mur arc	required due to the actual hazards as- ciated with the waste material, personnel re immediate access to an emergency com- cication device during times when haz- dous waste is being physically handled ection 265.34)	X			No. 11
	e)	If soc ai: of	required due to the actual hazards as- ciated with the waste material, adequate sle space to allow unobstructed movement emergency or spill control equipment is intained (265.35).	_X	:	·	

	NOW INTENTION				· · · · · · · · · · · · · · · · · · ·
,		Yes	<u>N</u>	N/A	Remark #
f)	If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout (265.37(a)).	X			No. 12
g)	Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented (265.37(b)).			X	
	Subpart D: Contingency and E	mergen	су		
		<u>Yes</u>	No	N/A	Remark #
Con	facility meets all requirements for tingency Plan and Emergency Procedures Section 265, Subpart D. The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:	X	ANTONIO		No. 13
	 Actions to be taken by personnel in the event of an emergency incident. 	<u> X</u>	· .		anness and the same of the sam
-	 Arrangements or agreements with local or state emergency authorities. 	X			
	Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.		X		No. 14
	 A list of all emergency equipment in- cluding location, physical description and outline of capabilities. 	X	· · · · · · · · · · · · · · · · · · ·		
	 If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility per- sonnel (Section 265.51(f)). 	X	· ·	· .	No. 15

3.

KCKA INICKTIA DIVIOD TUDLECTION N/A Remark # Yes A copy of the Contingency Plan and any plan b) revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. No. 16 (Section 265.53) Х The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54). No. 16 Х An emergency coordinator is designated at all times (on-site or on-call), is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency No. 14 Plan (Section 265.55). e) If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary No. 17 under Section 265.56. REMARKS, SEC. 265, SUBPARTS C AND D No. 9 The plant was once evacuated due to a toluenediisocyanate leak. No. 10 Alarm system tested monthly, fire and communications equipment tested weekly. No. 11 Foremen are equipped with radio communication. No. 12 A nurse is available on site during the first shift. Plant security personnel have first aid training. The fire department has been familiarized with plant hazards and layout. The existing plant SPCC plan and general safety plan covers the hazards No. 13 associated with the raw materials used at the plant, which are very similar to the hazards associated with the waste materials. No. 14 The existing plan contain various names of personnel to be contacted in the event of an emergency, but not all of them would qualify as the designated Emergency Coordinator required by Section 265.51 of the RCRA regulations. No. 15 The plant has a general evacuation plan which does not address the specific hazards presented by the storage of regulated hazardous wastes. No. 16 A separate contingincy plan or an amendment to the existing plan written around the specific hazards presented by the storage of listed (F002) hazardous wastes would better satisfy the requirements of Section 265, Subpart D.

No. 17

incident.

The existing plan worked satisfactorily during the toluenediisocyanate leak

PART 3. GENERAL INTERIM STATUS REQUIREMENTS (Section 265)

	Part	al Subpart G: Closure For Non-Disposal Facil	lities	(Sec	tion 20	55.110(a))
			<u>Yes</u>	<u>No</u>	N/A	Remark #
4.	qui	facility meets all applicable closure re- rements under Section 265, Subpart G for Disposal Facilities:	-	· · · · · · · · · · · · · · · · · · ·	<u> x</u>	No. 18
	a)	A written closure plan is on file at the facility and contains the following elements: (Section 265.112)	. '			
	•	 A description of how and when the fa- cility will be closed (265.112(a)(1). 	and the second s		X	
		2. A description of how any of the applicable closure requirements in other subparts of Section 265 (Tanks-265.197, Surface Impoundments-265.228) will be implemented.			X	
		 An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. 			X	
	· · · · · · · ·	 A description of steps taken to de- contaminate facility equipment. 	-		X	·
:	· .	A list of dates over which the various phases of closure are expected to be completed.	-		X	
e Ve	b)	The closure plan has been amended, if necessary, in response to changes in facility design or processes.			<u> X</u>	
	c)	The closure plan has been submitted to the regional administrator 180 days prior to beginning the closure process.	married (**		X	
	d)	The facility has been closed within the time limits specified by Section 265.113.			X	· · · · · · · · · · · · · · · · · · ·
	e)	Upon completion of closure all facility equipment and structures were decontaminated and any hazardous residues were properly disposed of (265.114).	· · · .		<u> X</u>	

	and the second s	•	<u>Yes</u>	<u>No</u>	N/A	Remark #
f)	Completion of closure has been certified the regional administrator by the owner/operator and an independent Professional	0				
	Engineer (265.115).			 	<u>X.</u>	·
g)	The facility has been closed in a manner which minimizes any future problems (265.111).	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\			X	

REMARKS, PART 3. SUBPART G, CLOSURE

No. 18 A clasure plan is not required until May 19, 1981.

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

SUBPARTS INCLUDED

- Subpart I: Management of Containers
 Subpart J: Management of Tanks
 Subpart K: Surface Impoundments

4.	Sub	part L: Waste	Piles		· \	,	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·	
			Subpart I:	Management	of Cont	ainers	5		
•	. :					<u>Yes</u>	No	N/A	Remark #
1.	The men	facility mee t of Containe	ts all requi rs in Section	rements for M n 265, Subpar	lanage- t I:	eronemoniole.	X	·	
	a)	Hazardous wa tainers which and are comp them (Section	h are in good atible with	d physical co the wastes si	ondition	X			-
	b)	The area whe spected for at least wee documented (evidence of kly and such	leaks or cori	rosion	X	en magnessanine		No. 19
NOT	E.	FACILITIES OP NOT REQUIRED REQUIREMENTS OFFERED FOR T AFFIX AN ACCU	TO MEET PRE- UNTIL THE CO RANSPORT AND	TRANSPORT LA NTAINERS ARE ARE NOT REQ	BELING ACTUALLY UIRED TO				
	c)	Containers h waste(s) are meters) from general requ wastes in Se ration, sign	located at the propert irements for ction 265.17	least 50 fee y line and t handling su	t (15 he ch epa-	X			
	d)	in the same containers u controlled a	containers on Inless it is Ind safe cond	rials are not or put in con done under c litions as sp Section 265.	taminated ompletely ecified	д У			
	e)	never stored interact wi	i near other	rdous wastes materials wh in a hazardo (c)).	ich may		<u> </u>		No. 7

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

Subpart J: Storage in Tanks

			<u>Yes</u>	<u>No</u>	N/A	Remark #
2.		facility meets all requirements for storage tanks in Section 265 Subpart J:			X	
•	a)	The tank(s) are operated in compliance with the safety requirements of Section 265.17 and 265.192(b) and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d).			X	
	b)	Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c)).			X	April 10 Marie 10 Mar
	c)	Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194).			X	
	d)	Weekly inspections are made of all tank construction materials and containment structures (265.194).			X	· ·
	e)	Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Section 265.193(a)).	Rand Change & Sales		X	
		 A complete waste analysis plus bench scale tests or pilot tests were con- ducted prior to implementing the pro- posed changes and all data is on file in the facility operating record. 	———		X	
		 Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record. 			<u>X</u>	

 $\underline{\underline{\text{No. 19}}}$ Inspections of container storage area for leaks and corrosion are not documented.

		<u>Yes</u>	<u>No</u>	N/A	Remark #
f)	With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Section 265.198 (a):			<u> </u>	
	 The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17 				
	(b).			<u>X</u>	and the second s
	 The waste is stored or treated under pro- tected conditions eliminating the possi- bility of ignition or reaction. 		·	X	
g)	Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFP buffer zone requirements (Flammable and Combustible Code-1977) (Section 265.198(b)).	e A	· .	X	
h)	Incompatible waste materials are not placed in the same tanks or put in contaminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Section 265.199).	-		X	
j)	Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed			χ	

REMARKS, PART 4 SUBPART J- TANKS

PART 4. LONG-TERM STORAGE REQUIREMENTS (Section 265)

Subpart K: Surface Impoundments Remark # N/A Yes No The facility meets all requirements for management of wastes in Surface Impoundments in Section χ 265, Subpart K: a) The Surface Impoundment is designed to operate with at least 2 feet (60 cm.) of freeboard and has a structural containment system adequate to contain the waste material (Section 265. 222). Earthen structural containment systems are equipped with protective cover such as grass, shale or rock to minimize erosion from wind and water (265.22). The level of freeboard in the Surface Imc) poundment is inspected at least once each operating day, the structural containment system is inspected at least once per week and all such inspections are documented (Section 265.226). Has the facility ever recorded an unplanned release of hazardous waste from the Surface Impoundment(s)? (Section 265.15) e) Whenever Surface Impoundments are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the Surface Impoundment, the facility has insured the safety of such changes by one or both of the following methods (265.225): A complete waste analysis plus bench scale or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record. Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.

•		<u>Yes</u>	<u>No</u>	N/A	Remark #
f)	With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in Surface Impoundments the facility has insured the safety of the operation by the following method (Section 265.229):			<u>X</u>	
	1. The waste is treated immediately after placement in the Surface Impoundment so that it is no longer Ignitable or Reacti and such treatment is done in compliance with the safety requirements of Section 265.17(b).	ve		: X	
g)	Incompatible materials are never placed in the same Surface Impoundment unless it is done in compliance with the safety requirements of Section 265.17(b) (Section 265.230))		X	
h)	As required by Subpart F, Section 265.90, (Ground Water Monitoring) the facility has implemented a ground water monitoring program capable of determining the impact of the Surface Impoundment(s) on the quality of the gound water in the uppermost aquifer underlying the facility.	3		<u> </u>	
j)	In lieu of a ground water monitoring prograture operator has a written demonstration there is a low potential for migration of hazardous waste or constituents via ground or surface waters which has been certified in writing by a qualified geologist in compliance with Section 265.90(c).			<u>X</u>	
k) Upon closure of the Surface Impoundment, the operator intends to remove all wastes, residues, liners and any contaminated soil as required by Section 265.228 in order to exempt the Surface Impoundment from further regulation under Section 265.)		<u>X</u>	

NOTE: IF THE OPERATOR ELECTS NOT TO EXEMPT THE SURFACE IMPOUNDMENT FROM FURTHER REGULATION BY REMOVING ALL WASTE MATERIALS, THE SURFACE IMPOUNDMENT IS SUBJECT TO THE POST-CLOSURE CARE AND GROUNDWATER MONITORING REQUIREMENTS SPECIFIED IN SUBPART G FOR DISPOSAL FACILITIES AND SUBPART N, SECTION 265.310 FOR LANDFILLS. (SECTION 265.228(e).

Subpart L: Storage in Waste Piles

4. The facility meets all requirements for storage in Waste Piles in Section 265, Subpart L: a) Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal (Section 265.251). b) If leachate or runoff from a Waste Pile would be a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation (Section 265. 253). 1. The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste. 2. The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff. 3. No liquids or wastes containing free liquids are placed in the pile. c) No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Section 265. 252). d) Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met (Section 265.256):								
in Waste Piles in Section 265, Subpart L: a) Waste materials which are subject to dispersal by wind have been adequately protected against such dispersal (Section 265.251). b) If leachate or runoff from a Waste Pile would be a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation (Section 265. 253). 1. The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste. 2. The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff. 3. No liquids or wastes containing free liquids are placed in the pile. c) No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Section 265. 252). d) Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met		•			Yes	<u>No</u>	N/A	Remark #
by wind have been adequately protected against such dispersal (Section 265.251). b) If leachate or runoff from a Waste Pile would be a hazardous waste, then one or more of the following steps have been taken to prevent or properly manage the situation (Section 265. 253). 1. The pile has been placed on an impermeable base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous waste. 2. The pile has been protected from precipitation and run-on in a manner which prevents the generation of leachate and runoff. 3. No liquids or wastes containing free liquids are placed in the pile. c) No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Section 265. 252). d) Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met	4.						X	
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tation and run-on in a manner which prevents the generation of leachate and runoff. 3. No liquids or wastes containing free liquids are placed in the pile. C) No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Section 265. 252). A) Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met			1.	able base, run-on has been diverted away from the pile and any leachate or runoff is collected and managed as a hazardous			X	
c) No new waste materials are added to an existing Waste Pile without first ascertaining that the material is compatible with the existing waste by conducting appropriate laboratory tests, which are documented in the facility operating record (Section 265. 252). d) Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met			2.	tation and run-on in a manner which prevents the generation of leachate and	TAN		χ	
isting Waste Pile without first ascertaining that the material is compatible with the ex- isting waste by conducting appropriate labo- ratory tests, which are documented in the facility operating record (Section 265. 252). d) Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met	* .		3.				X	· · · · · · · · · · · · · · · · · · ·
d) Ignitable or Reactive waste materials are not placed in Waste Piles unless one or both of the following conditions are met		c)	ist tha ist rat fac	ing Waste Pile without first ascertaining t the material is compatible with the exing waste by conducting appropriate laboory tests, which are documented in the ility operating record (Section 265.			X	
		d) .	Ign not bot	itable or Reactive waste materials are placed in Waste Piles unless one or h of the following conditions are met		- porter	X	

			Yes	<u>No</u>	N/A	Remark #
	Ţ.,	The addition to the pile results in a mix- ture which no longer meets the definition of Ignitable or Reactive and was done in	.			
		compliance with the safety requirements of Section 265.17(b).		-	<u>X</u>	
	2.	The Ignitable or Reactive material is physically or otherwise protected from conditions which may cause ignition or reaction.	· ·		X	
e)	the ing les	ompatible materials are never placed in same Waste Pile or near areas contain-residues of a incompatible material unsit is done in compliance with the ety requirements of Section 265.17(b) ction 265.257(a)(c).			<u>X</u>	
f)	nea wit	es of hazardous waste are never stored r other materials which may interact h the waste in a hazardous manner			X	

REMARKS, PART 4 - SUBPART L, WASTE PILES

L EPA LD. NUL Cursolidated Permitt From a Control Testing ! OH Ď a preprinted let it in the designation OHD 095030979 ation carefully; it through it and tritis appropriate fill-in Columbus Products Company the preprinted data 300 Phillipi Road left of the label spins that should appear) proper fill-in area(s) ADDRESS Columbus, Ohio 43228 complete and correct verifiers 1, III, V, and VI (**) must be completed regarding 300 Phillipi Road items if no label has their and FACILITY the instructions for LOCATION tions and for the legal and which this data is collected IL POLLUTANT CHARACTERISTICS INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if you is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms. SPECIFIC QUESTIONS YES ATTACHED SPECIFIC QUESTIONS NO B. Does or will this facility (either existing or proposed) A. Is this facility a publicly owned treatment works include a concentrated animal feeding operation or which results in a discharge to waters of the U.S.? χ Å aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B) (FORM ZA) 17 2.0 D. Is this a proposed facility (other than those described Calls this a facility which currently results in discharges χ to waters of the U.S. other than those described in in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D) χ A or 8 sbove? (FORM 2C) 22 23 26 F. Do you or will you inject at this facility industrial or E. Does or will this facility treat, store, or dispose of hezardous wastes? (FORM 3) χ municipal effluent below the lowermost stratum conχ taining, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4) 32 G. Do you or will you inject at this facility any produced H. Do you or will you inject at this facility fluids for spewater or other fluids which are brought to the surface cial processes such as mining of sulfur by the Frasch in connection with conventional oil or natural gas proχ χ process, solution mining of minerals, in situ combusduction, inject fluids used for enhanced recovery of tion of fossil fuel, or recovery of geothermal energy? oil or natural gas, or inject fluids for storage of liquid (FORM 4) hydrocarbons? (FORM 4) is this facility a proposed stationary source which is one of the 28 industrial categories listed in the in-J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the structions and which will potentially emit 100 tons instructions and which will potentially emit 250 tons χ per year of any air pollutant regulated under the per year of any air pollutant regulated under the Clean Glean Air Act and may affect or be located in an Air Act and may affect or be located in an attainment attainment area? (FORM 5) erea? (FORM 5) III. NAME OF FACILITY RODUC 0 L U M B U S IV. FACILITY CONTACT B. PHONE (area code & no.) V. FACILITY MAILING ADDRESS A. STREET OR P.O. BOX D. ZIP CODE 3 UMBUS 0 VI. FACILITY LOCATION A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER B. COUNTY NAME C. CITY OR TOWN D.STATE E. ZIP CODE if known 3 2 2 Н EPA Form 3510-1 (6-80) CONTINUE ON RET

		1 1 ; 1	
7 3 6 3 2 (specific REFRIGERATORS	7	(specify)	
13 116 - 19 C. THIRD	15 16 - 19	B. FOU	RTH
(specify)	7	(specify)	
VIII. OPERATOR INFORMATION	T5 16 10 10 11 12	1	
	OMPANY		B. Is the name listed in Item VIII-A also the owner?
C. STATUS OF OPERATOR (Enter the appropriate letter)	into the answer box; if "Other"	, specify.)	D. PHONE (area code & no.)
F = FEDERAL M = PUBLIC (other than federal or state S = STAYE O = OTHER (specify) P = PRIVATE E. STREET OR P.O. BOX	P (specify)	Å 6	
3 0 0 PHILLIPI ROAD	T	55 SS SS SS SS SS SS SS SS SS SS SS SS S	
COLUMBUS	G.STATE	4 3 2 2 8 Is the fa	AN LAND cility located on Indian lands?
16 98	41 42	47 - 51 5.2	YES 📈 NO
X. EXISTING ENVIRONMENTAL PERMITS A. NPDES (Discharges to Surface Water) D. PSD (Air Emissions from Proposed S	oures!	
9 N O H Ø Ø Ø Ø 4 5 9 6 9 P N	. A	0	
B. USC (Underground Injection of Fluids)	E. OTHER (specify)	30	
19 UT N A 9 N N N 16 17 16 17 16 17 16 17 16 17 16 17 16 17 17 16 17 17 18 18 18 18 18 18 18 18 18 18 18 18 18	,A.,,,,	' ' (specify)	
C. RCRA (Hazardous Wastes)	E.OTHER (specify)	(specify)	ass - Tare
10 1R T, O, B, E, I, S, S, U, E, D, 9 N 11 15 16 17 18	, A	1 1 20	
Attach to this application a topographic map of the area the outline of the facility; the location of each of its exitreatment, storage, or disposal facilities, and each well water bodies in the map area. See instructions for precise in	where it injects fluids under	ile beyond property bou and discharge structure ground. Include all spri F9: 450	Inderies. The map must show s, each of its hazardous waste ings, rivers and other surface
XIL NATURE OF BUSINESS (provide a brief description)		,	
MANUFACTURER OF REFRIGERATORS AND E	DISHWASHERS		
es establishment de la companya de l		F9: A	
na de la companya de la companya de la companya de la companya de la companya de la companya de la companya de		51	
NAME OF THE PROPERTY OF THE PR			
THE PROPERTY OF THE PROPERTY O			r.
XIII. CERTIFICATION (see instructions)			
I certify under penalty of law that I have personally examatic attachments and that, based on my inquiry of those pospelication, I believe that the information is true, accurations information, including the possibility of fine and imp	orsons infinediately respons	the information submit sible for obtaining the i are that there are signif	ted in this application and all information contained in the icant penalties for submitting
A. NAME & OFFICIAL TITLE (Type or print) F. DIEKMANN, PRESIDENT	B. SIGNATURE		C. DATE SIGNED
COMMENTS FOR OFFICIAL USE ONLY			1 11100
C			
PA Form 3510-1 (6-80) REVERSE			

RCPA SEE A	J (Tris informa	tion is required under the	to all specific		
FOR OFFICIAL USE O	NLY	K 90		A .	Constitution of the second
AFFROYED (Vr. mo.	& day)	The state of the s	COM	MERTS	
III. FIRST OR REVISED	APPLICATION 2				
Place an "X" in the appropr revised application. If this is	iate box in A or B below (n s your first application and	nark one box only) to ind you already know your fa	licate whether this acility's EPA I.D. I	is the first application you ar Number, or if this is a revised	e submitting for your facility or a application, enter your facility's
A. FIRST APPLICATIO	N (place an "X" below and	I provide the appropriate	date)	, or it will be a few sec	application, enter your facility's
[X] I. EXISTING FAC	ILITY (See instructions for Complete item belo	ow.)		71	LITY (Complete item below.) FOR NEW FACILITIES.
S 5 2 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	(use the boxes to the let		UCTION COMME	day) NCED YR. Mo. 73 74 75 76	PROVIDE THE DATE (yr., mo., & day) OPERA- TION BEGAN OR IS EXPECTED TO BEGIN
	TON (place an "X" below INTERIM STATUS	and complete Item I abo	ve)	2. FACILITY	HAS A RCRA PERMIT
III. PROCESSES - COD				72	
	er the code from the list of lines are needed, enter the c luding its design capacity) i				pility. Ten lines are provided for ad in the list of codes below, then
2. UNIT OF MEASURE	- For each amount entere	ed în column B(1), enter t	he code from the l	e process. List of unit measure codes belo	
measure used. Only t	the units of theasure that ar	e listed below should be u RIATE UNITS OF	used.		
PROCESS	CESS MEASUR	RE FOR PROCESS GN CAPACITY	PRO	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storege: CONTAINER (barrel, drur	n, etc.) SOI GALLONS	OR LITERS	Treatment:	Т01	
TAME Waste File	502 GALLONS S03 CUBIC YA CUBIC ME	OR LITERS	SURFACE IMPO		GALLONS PER DAY OR LITERS PER DAY GALLONS PER DAY OR
SURFACE IMPOUNDME! Dispossi:	YT 504 GALLONS	OR LITERS	INCINERATOR	T03	LITERS PER DAY TONS PER HOUR OR METRIC TONS PER HOUR;
injection well campfill	D80 ACRE-FE	OR LITERS ET (the volume that er one acre to a	OTHER (Use for thermal or biolog	r physical, chemical, TO4	GALLONS PER HOUR OR LITERS PER HOUR GALLONS PER DAY OR
LAND APPLICATION	depth of or HECTARE D81 ACRES OF	ne foot) OR -METER R HECTARES	processes not occ	curring in tanks, lments or inciner-	LITERS PER DAY
OCEAN DISPOSAL SURFACE IMPOUNDMEN	LITERS P	SPER DAY OR ER DAY SOR LITERS	the space provide	ed; Item III-C.)	
	UNIT OF MEASURE			T OF	UNITOF
UNIT OF MEASURE	CODE	UNIT OF MEASURE	cc	SURE DDE UNIT OF ME	
Liters	Y	TONS PER HOUR METRIC TONS PER H	10UR	.D HECTARE-M .W ACRES	ETER. F
GALLONS PER DAY EXAMPLE FOR COMPLET	U	GALLONS PER HOUR LITERS PER HOUR. De numbers X-1 and X-2 is	bolovele A south	. н	nk can hold 200 gallons and the
5	The facility also has an inci	inerator that can burn up	to 20 gallons per h	hour.	nk can note 200 gallons and the
DUP	3 1				
CESS CODE	DCESS DESIGN CAPA	2. UNIT FOR	A. PRO-	B. PROCESS DESIGN	CAPACITY FOR
Z (from list	1. AMOUNT (specify)	SURE USE (enter ONLY	知 CODE CODE Com list above)	1. AMOUNT	OF MEA OFFICIAL SURE USE (enter ONLY
X-1S 0 2	600	code) 2	16 - 18 19	3250/05 Truing	27 28 29 - 32
X-2 T 0 3	20	E	6 T Ø 3	32500€5twice_e. Ø.Ø25	D D
1 s Ø 1	891 øøøø	G	5		
2 s	566ØØØØ	G	8		
3			9		
4 15 15 15	- 2	7 28 22 - 22	10		
EPA Form 3510-3 (6-80)		and the state of t	1 OF 5		CONTINUE ON REVERSE
					673

FOR OFFICIAL USE SUOU AN AND WOIT PAINT SLUDGE IS AIR DRIED IN OUTSIDE PITS TO ALLOW IT TO HARDEN AND TO INCREASE SOLIDS

CONTENT FOR LANDFILL DISPOSAL.

IV DESCRIPTION OF HAZARDOUS WASTE	ARDOUS WASTES	

- EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed wasters that will be handled which possess that characteristic or contaminant.
- UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

METRIC UNIT OF MEASURE CODE CODE ENGLISH UNIT OF MEASURE KILOGRAMS.....K METRIC TONS . . . TONS,

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility. For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code/s/ from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item (V-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	H W/ (e)	A Z 4 S	TE	RI .N	0	B. ESTIMATED A QUANTITY OF	ANNUAL	C.U OF N SU (er	NE.	^†	43.0 43.0 4.35		1	P			ss c ter)	ODE	S	<u> </u>	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))	
X-1	K	10) -	5	4	900			P		T	0	3	D	8	0						
X-2	D	10	 	0	2	400			P		T	0	3	D	8	0	1	- 1		T .I		
X-3	D	6	7	9	1	100			P		T	0	3	D	8	0	† 1	1,		1		
X-4	L) (7	0	2						Ī				ī	T	1	1			included with above	-28

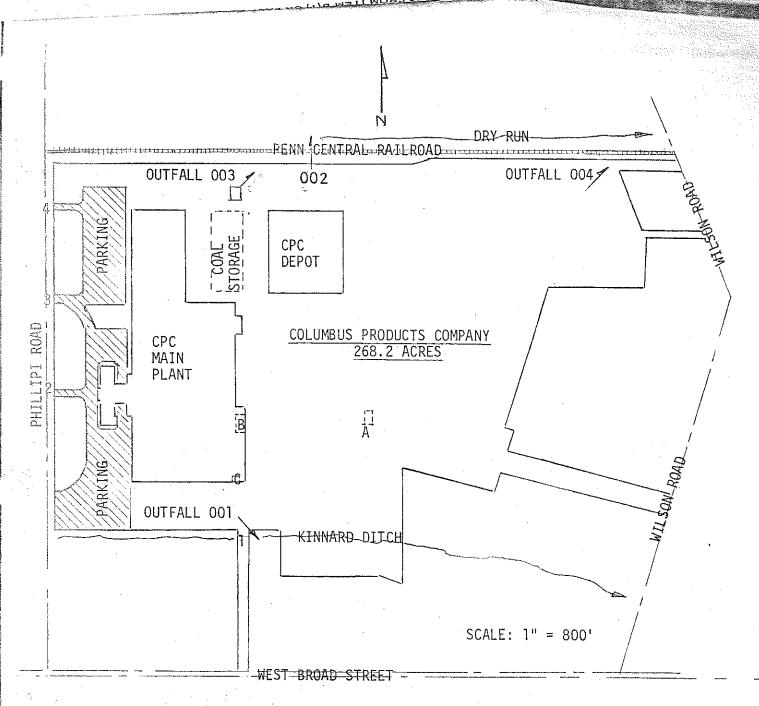
SQLIDS SASASADI OT GNA NAGRAH OT II LIOLIN OT 3119 C. STATE DESIGN CAPACITY. OMBER (enter from page 1) FOR OFFICIAL USE ONLY OHD0,950309683 7/A C 3 2 W DUP DESCRIPTION OF HAZARDOUS WASTES (continued) C. UNIT OF MEA SURE (enter code) A. EPA HAZARD D. PROCESSES B. ESTIMATED ANNUAL QUANTITY OF WASTE WASTENO 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) (entercode) 25 27 1,1,1 TRICHLORETHANE WASTE SOLVEN 660 ØØØ FIDD 1 G Ø RECLAIMED & RETURNED METHYLENE SOLVENT WASTE SOLVENT-8000000 <u>g</u> G S RECLAIMED & RETURNED 2 2 250 Ø Ø Ø ø G S T.D.I. - TO BE RECYCLED PAINT SOLVENT -660 ØØØ 3 g S G TO BE RECYCLED 4 PAINT SLUDGE-AIR DRIED- ON SITE 15dddøøø _ø G S LAND FILLED - OFF SITE 6 WASTE PICKLE LIQUOR NEUTRALIZED 78ØØØ**Ø**Ø T Ø G SOLUTION 1000 ¢ p0 PAINT BURN OFF OVEN 8 9 10 11 13 14 15 16 17 18 19 20 2 22 23 24 25 26 EPA Form 3510-3 (6-80)

fenter "A", "B", "C", etc. behind the "3" to identify

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EPA I.D. NO. (enter from page 1)				-	****
FOHDØ95Ø8Ø93936		-			
V. FACILITY DRAWING					
All existing facilities must include in the space provided on	page 5 a scale o	drawing of the facility (see in	nstructions for more o	detail). Fl	. 7 55
VI. PHOTOGRAPHS All avisting facilities must include the state of the second of the s				90 - 17 - 18 - 18 - 18 - 18 - 18 - 18 - 18	The state of the s
All existing facilities must include photographs (aeri treatment and disposal areas; and sites of future stor	a <i>l or ground-</i> age, treatme	nt or disposal areas (see i	eate all existing str instructions for mo	ıctures; exis re detail).	ting storage, A
VII. FACILITY GEOGRAPHIC LOCATION					
LATITUDE (degrees, minutes, & seconds,		LC	ONGITUDE (degrees,	minutes, & se 300	conds)
VIII. FACILITY OWNER			72 - 74 75	76 77 - 79	
A. If the facility owner is also the facility operator as I	isted in Section	VIII on Form 1 "Consul	1-5		
skip to Section FX below.	isted iii Sectioi	viii oii Foim 1, General	information", place a	n "X" in the	box to the left and
B. If the facility owner is not the facility operator as li	sted in Section	VIII on Form 1, complete	the following items:		
1. NAME OF FACIL	ITY'S LEGAL	OWNER		2. PHONE	NO. (area code & no.
E WHITE CONSOLIDATED INDUSTRIES				2 1 6 -	2 5 2 - 3 7 0
3. STREET OR P.O. BOX		4. CITY OR TOW	N 55	56 - 58 ST.	59 - 61 62 -
F 1177Ø BEREA ROAD		LEVELAND	C	H 4	4 1 1 1
IX. OWNER CERTIFICATION	45 15 16		A0 4		3,1
I certify under penalty of law that I have personally a	examined an	d am familiar with the in	formation submitt	ed in this an	d all attached
documents, and that based on my inquiry of those in submitted information is true, accurate, and complet	e, I am awar	rieulately responsible to e that there are significar	r obtaining the info nt penalties for sub	rmation, I E mitting false	pelieve that the information,
including the possibility of fine and imprisonment. A. NAME (print or type)	B. SIGNATU	\sim			
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	/ '	1. selfa	ve	11/1	17/8
X, OPERATOR CERTIFICATION					
I certify under penalty of law that I have personally educuments, and that based on my inquiry of those in mitted information is true, accurate, and complet including the possibility of fine and imprisonment.	ıdıvıduals imi	nediately responsible for	- ohteining the infe	rmation 15	valiana that the
A. NAME (print or type)	SIGNATO	Tree		C. DATE SIGN	NED
G. F. DIEKMANN	1.0°.1°	Dielo		11/7/8	30



A - PAINT SLUDGE DRYING PIT 24' X 24'

B - SALVAGE AREA, DRUM HANDLING AND STORAGE 80' X 240' C - LIME NEUTRALIZATION AREA, ACID WASTE TO SANITARY SEWER 20' X 40'

1,2,3 & 4 - GATE NUMBERS





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

RECEIVED WMD RCRA RECORD CENTER MAY 0 6 1999

REPLY TO THE ATTENTION OF:

HRE-8J

April 21, 1993

Mr. Albert Bell Senior Vice President Consolidated Stores, Inc. 300 Phillipi Road Columbus, Ohio 43228

Re:

Visual Site Inspection Consolidated Stores, Inc. (Formerly Columbus Products, Inc.) Columbus, Ohio OHD 095 030 979

Dear Mr. Bell:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief

Minnesota/Ohio Technical Enforcement Section

RCRA Enforcement Branch

PRC Environmental Management, Inc. 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118



PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

CONSOLIDATED STORES, INC.
(FORMERLY COLUMBUS PRODUCTS, INC.)
COLUMBUS, OHIO
OHD 095 030 979

DATE ILOUIDI

RIN #_____

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, DC 20460

Work Assignment No. : C05087

EPA Region : 5

 Site No.
 : OHD 095 030 979

 Date Prepared
 : March 5, 1993

 Contract No.
 : 68-W9-0006

 PRC No.
 : 009-C05087OH4F

Prepared by : PRC Environmental Management, Inc.

(Pete Zelinskas)

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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Consolidated Stores, Inc. (Consolidated), facility in Columbus, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritizing RCRA facilities for corrective action.

The facility covers about 268 acres in an industrial area of western Columbus. Consolidated purchased the facility from Columbus Products, Inc. (Columbus Products) in 1989 and uses it as a retail distribution center. Consolidated generates no hazardous waste. From 1954 to 1989, the facility was used to manufacture refrigerators and dishwashers. In 1980, Columbus Products filed a Part A permit application as a treatment, storage, or disposal (TSD) facility. Storage units identified were the Former Hazardous Waste Storage Area (SWMU 2) (S01 - container storage) and the Former Paint Sludge Drying Area (SWMU 3) (S04 - surface impoundment). The permit application listed the following waste codes: F001, F002, U223, U239, and D002. Columbus Products RCRA closed SWMU 2 in 1983; however, SWMU 3 did not go through closure.

The nearest residential area is about 0.75 mile northeast of the facility. The nearest school is about 1 mile east. There are no sensitive environments near the facility. It is completely surrounded by a chain-link fence, excluding the west side of the main building. Consolidated has security personnel on site 24 hours per day, 7 days per week.

The PA/VSI identified the following five SWMUs and one AOC at the facility:

Solid Waste Management Units

- Former Satellite Accumulation Areas
- 2. Former Hazardous Waste Storage Area
- 3. Former Paint Sludge Drying Area
- 4. Former Wastewater Pretreatment Area
- Waste Oil Storage Area

Area of Concern

1. Former Liquid Materials Storage Area



The potential for this facility to release hazardous constituents to on-site soils and ground water is moderate. The Former Paint Sludge Drying Area (SWMU 3) could not be located during the VSI, and PRC believes the unit may have been buried. The possibility that a release to on-site soils and ground water from the Former Liquid Materials Storage Area (AOC 1) has occurred is low to moderate. The area was used by Columbus Products as a main storage and traffic area for chemicals moving in and out of the facility. An underground storage tank (UST) used by Columbus Products is in this area; however, its use and its capacity are unknown. The Waste Oils Storage Area (SWMU 5) is within AOC 1 and provides no secondary containment for drums stored there. The water table in the area occurs about 10 feet below ground surface. However, because the geology beneath the facility mostly consists of thickly bedded clays, ground water is of poor quality and is not used as a local drinking water source. No drinking water wells are located within 3 miles of the facility.

The potential for all SWMUs at the facility to release hazardous constituents to surface water is low. Columbus Products had a National Pollutant Discharge Elimination System (NPDES) permit for releases to drainage pathways at the north and south ends of the facility. The two pathways merge and eventually empty into the Scioto River about 2.75 miles from the facility. The Scioto River is the primary drinking water source for western Columbus. Consolidated does not have an NPDES permit. Discharges to surface water from the facility consist only of storm water.

The potential for the facility to release hazardous constituents to air is low. Columbus Products had 16 air permits covering paint ventilation systems. Consolidated has no sources that could release hazardous constituents to air and has no air permits.

Because the Former Paint Sludge Drying Area (SWMU 3) could not be located during the VSI, was never properly closed, and could be buried, PRC recommends that a geophysical survey be performed in the SWMU's supposed location. Once the probable location of the unit is determined, the unit should be RCRA closed. Soil borings with continuous split-spoon sampling should be performed throughout the area to ground water. Soil samples should be analyzed for hazardous constituents. A number of the borings should be converted to ground-water monitoring wells, which should then be sampled and analyzed for hazardous constituents.

PRC also recommends that, because of its use over the years, and because of observations made during the VSI, soil and ground-water samples be taken in the Former Liquid Materials Storage Area (AOC 1) and analyzed for hazardous constituents. Sludge should be sampled from the UST in AOC 1 and analyzed for hazardous constituents. In addition, secondary containment should be provided at the Waste Oil Storage Area (SWMU 5).

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Consolidated Stores, Inc. (Consolidated) [formerly Columbus Products, Inc. (Columbus Products)], facility in Columbus, Ohio. The PA was completed on November 2, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on November 3, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified five SWMUs and one AOC at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included as Attachment A. The VSI is summarized and four inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

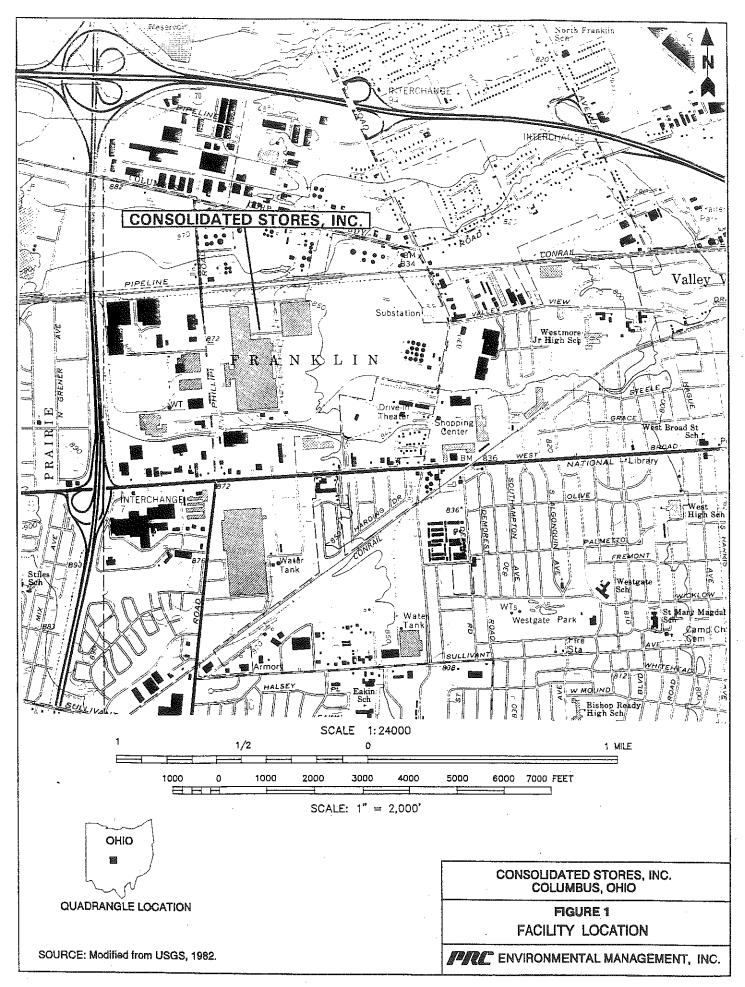
2.1 FACILITY LOCATION

The Consolidated facility is located at 300 Phillipi Road in Columbus, Franklin County, Ohio (latitude 39°57'30" north, longitude 83°06'30" west), as shown in Figure 1. The Consolidated facility is located in a mixed industrial and small business area of western Franklin County. It is bordered to the north by Conrail railroad tracks; to the east by open land and a British Petroleum, Inc., oil refinery; to the south by a series of retail stores and two automobile dealerships; and to the west by a number of small businesses.

2.2 FACILITY OPERATIONS

The Consolidated facility covers about 268 acres; about 2 million square feet of this is indoors. The facility consists of two separate buildings on the western half of the property. The main building, which includes storage areas, a receiving dock, and offices, covers about 35 acres. The second building, used for receiving and shipping, covers about 10 acres. Asphalt drives and truck trailer parking areas surround the buildings. The remaining acreage is undeveloped and highly overgrown with vegetation.

The facility opened in 1954 by Westinghouse, Inc. (Westinghouse), and was used to manufacture refrigerators and dishwashers. Manufacturing operations included metal forming, assembly, painting, and limited electroplating. The main building on the property was used for manufacturing, while the smaller building was used as a parts distribution warehouse. In 1975, Westinghouse sold its major appliance business, and the facility was purchased by White Consolidated Industries, Inc. (White). White operated the facility under the name Columbus Products, Inc (Columbus Products). At one time, the facility employed about 3,500 people; as recently as 1980, there were about 2,200 employees. In 1982, refrigerator production at the facility ceased, and scaling down of operations began. In 1986, the parts distribution building was sold to Consolidated. Operations at the facility ended in 1988, and all manufacturing equipment was removed from the main building. Consolidated purchased the main building in 1989. PRC was unable to locate, and Consolidated was unable to supply, the names of any former employees of Columbus Products.



Currently, Consolidated operates as a retail distribution company. Retail products, usually consisting of off-brand items, wholesale products from company buyouts and bulk manufacturer sales, are acquired by Consolidated and stored at the facility. The products are then distributed to Consolidated's retail outlets, including Big Lots and Odd Lots. Consolidated uses the facility entirely for receiving, warehousing, and shipping of the retail products, which include general household goods, clothing, automobile parts, and sporting goods. Consolidated may add another building at the facility to supply more warehousing space.

2.3 WASTE GENERATION AND MANAGEMENT

The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and the AOC, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

No manufacturing currently occurs at the facility. Consolidated is a retail distribution company and uses the facility for receiving, storage, and shipping of retail goods. No hazardous waste is generated at the facility. Nonhazardous waste oils are generated from the maintenance of forklift trucks used throughout the facility. The waste oils are placed in 55-gallon drums and stored in the Waste Oil Storage Area (SWMU 5). Consolidated generates about 20 drums of waste oil per year. The waste oil is taken to Clark Oil, Inc., in Columbus for reclamation.

Under Columbus Products, hazardous wastes generated included waste paint materials (F003 and D001); waste paint sludge (D001); waste methylene chloride (F002); waste 1,1,1-trichloroethane (F001); waste acid solution (D002); and wastewater pretreatment sludge (F006). Nonhazardous wastes included wastewater and waste oils and hydraulic fluids.

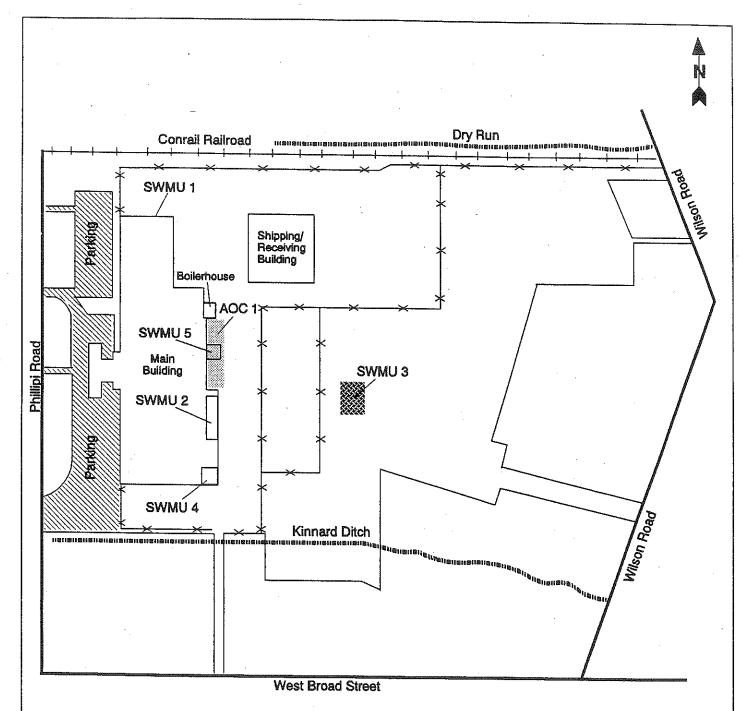
Waste paint materials (F003 and D001), including solvents and sludges, were generated from painting refrigerators and dishwashers. The materials were mainly generated from cleaning paint application equipment and from expired or unusable product. The waste materials were placed in 55-gallon drums in Former Satellite Accumulation Areas (SAA) (SWMU 1). When full, the drums were transferred to the Former Hazardous Waste Storage Area (SWMU 2). Waste paint materials, mainly composed of solvents, were pumped directly from the 55-gallon drums at SWMU 2 to a bulk tanker truck. These materials were taken to Systech Liquid Treatment General Portland, Inc. (Systech), in Paulding, Ohio, for fuels blending. Columbus Products hazardous waste shipment manifests indicate that about 120 drums of waste paint materials were shipped from the facility annually.

According to a Part A permit application filed in 1980 by Columbus Products, a Former Paint Sludge Drying Area (SWMU 3) was present at the eastern portion of the facility (Columbus Products, 1980b). The unit was used to dewater drummed paint sludge (D001) from SWMU 2 to

TABLE 1 SOLID WASTE MANAGEMENT UNITS

SWMU Name	RCRA Hazardous Waste <u>Management Unit^a</u>	Status
Former SAAs	No	Inactive
Former Hazardous Waste Storage Area	Yes	RCRA-closed in 1983
Former Paint Sludge Drying Area	Yes	Inactive, did not undergo RCRA closure
Former Wastewater Pretreatment Area	No.	Inactive, removed in 1988
Waste Oil Storage Area	No	Active
	Former SAAs Former Hazardous Waste Storage Area Former Paint Sludge Drying Area Former Wastewater Pretreatment Area	Former SAAs Former Hazardous Waste Storage Area Former Paint Sludge Drying Area Former Wastewater Pretreatment Area Management Unit ^a Yes Yes Yes No

A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.



Solid Waste Management Units

SWMU 1 Former Satellite Accumulation Areas

(throughout main building) SWMU 2 Former Hazardous Waste Storage Area

SWMU 3 Former Paint Sludge Dyring Area (suspected)

SWMU 4 Former Wastewater Pretreatment Area

Waste Oil Storage Area SWMU 5

Areas of Concern

AOC 1 Former Liquid Materials

Storage Area



Fence manananam Ditch

+ Railroad

Source: Modified from Columbus Products, 1980b.

SCALE: 1" = 800'

CONSOLIDATED STORES, INC. COLUMBUS, OHIO

> FIGURE 2 **FACILITY LAYOUT**

ENVIRONMENTAL MANAGEMENT, INC.

TABLE 2 SOLID WASTES

Waste/EPA Waste Code ^a	Source	Solid Waste Management Unit
Under Consolidated	·	
Waste Oils/NA	Forklift truck maintenance	5
Under Columbus Products		
Waste paint materials/F003 and D001	Painting operations and maintenance	1 and 2
Waste paint sludge/D001	Painting operations	1, 2, and 3
Waste methylene chloride/F002	Coating and painting line flushing	I and 2
Waste 1,1,1-trichloroethane/F001	Degreasing operations	l and 2
Waste acid solution/D002	Electroplating operations	1 and 4
Wastewater pretreatment sludge/F006	Wastewater pretreatment	1, 2, and 4
Wastewater/NA	Electroplating operations	4
Waste oils and hydraulic fluids/NA	Maintenance of facility machinery	1 and 2
Notes:	1	
Not applicable (NA) designates in	nonhazardous waste.	

⁸

make the materials acceptable for landfill disposal. No manifests are available indicating landfill disposal of sludge, and PRC could not determine how long the unit was used. Consolidated officials had no knowledge of the unit. PRC could not locate the unit during the VSI.

Columbus Products generated waste methylene chloride (F002) from flushing coating and painting lines. The waste materials were placed in 55-gallon drums at the Former SAAs (SWMU 1) and eventually moved to SWMU 2. The materials were pumped from the drums to a bulk tanker truck and taken to Solvent Resource Recovery, Inc. (SRR), in West Carrolton, Ohio for reclamation. Columbus Products generated about 20 drums of waste methylene chloride per year.

From degreasing operations, Columbus Products generated waste 1,1,1-trichloroethane (F001). The waste solvent was placed in 55-gallon drums at the Former SAAs (SWMU 1) and eventually transferred to SWMU 2. Columbus Products generated about two drums per year of waste 1,1,1-trichloroethane. The drums were taken to SRR for reclamation. During the VSI, PRC could not determine former locations of degreasing operations.

Until 1985, Columbus Products generated waste acid solution (D002) and rinsewaters from an electroplating process. The solution was pumped into 55-gallon drums at the Former SAAs (SWMU 1), transferred to the Former Wastewater Pretreatment Area (SWMU 4), and slowly added to the pretreatment system. Rinsewaters from the electroplating process flowed continuously. Wastewater was treated by neutralizing it with a lime and caustic mixture. The neutralized solution was then released to the City of Columbus sanitary sewer.

To improve wastewater treatment, the Former Wastewater Pretreatment Area (SWMU 4) was upgraded in 1984 and 1985. Columbus Products added additional tanks and feed lines for a metal hydroxide precipitation system. All wastewater, which flowed at a rate of about 180 gallons per minute (gpm) during normal operating periods, was neutralized. The system generated wastewater pretreatment sludge (F006) and wastewater. Sludge was placed in 55-gallon drums in the Former SAAs (SWMU 1) and eventually transferred to the Former Waste Storage Area (SWMU 2). Columbus Products generated about 11 55-gallon drums of sludge per month, which were taken to Fondessy Enterprises, Inc. (Fondessy), in Oregon, Ohio for treatment and disposal. Pretreated wastewater was discharged from SWMU 4 to a City of Columbus publicly owned treatment works (POTW).

Columbus Products also generated nonhazardous waste oils and hydraulic fluids. The materials were generated from maintenance performed on machinery and vehicles throughout the facility. The wastes were placed in the Former SAAs (SWMU 1) throughout the facility and transferred to SWMU 2. No documentation is available detailing disposal of the materials.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the facility.

Columbus Products held a National Pollutant Discharge Elimination System (NPDES) permit for discharges of storm water from the facility to four outfalls. In 1981, OEPA cited the facility six times for excess oil and grease in outgoing storm water (OEPA, 1981a and 1981c). No documentation is available detailing how the problems were addressed.

In late 1986, OEPA was alerted to oil-contaminated water leaving the facility via the NPDES outfalls. Columbus Products agreed that releases were occurring and were caused by water leaving a compressed air blowdown system. In January 1987, the water was rerouted to the sanitary sewer and the oil discharges ended (OEPA, 1987a).

2.5 REGULATORY HISTORY

Columbus Products submitted a Notification of Hazardous Waste Activity form to EPA in July 1980 (Columbus Products, 1980a). In November 1980, the facility filed a Part A permit application as a treatment, storage, or disposal (TSD) facility to operate under interim status. Storage units identified were the Former Hazardous Waste Storage Area (SWMU 2) (S01 - container storage) and the Former Paint Sludge Drying Area (SWMU 3) (S04 - surface impoundment). The permit application listed the following waste codes: F001, F002, U223, U239, and D002 (Columbus Products, 1980b).

In August 1982, Columbus Products informed OEPA that the facility would no longer store hazardous waste for over 90 days and would not require a TSD permit (Columbus Products, 1982). Columbus Products informed EPA of the permit withdrawal in June 1983. EPA immediately informed Columbus Products that a closure plan would be required for the facility before the permit application could be withdrawn. In August 1983, Columbus Products submitted to EPA a closure plan for the Former Hazardous Waste Storage Area (SWMU 2) (Columbus Products, 1983). The closure plan did not include the Former Paint Sludge Drying Area (SWMU 3).

Closure of SWMU 2-involved removing of all hazardous waste from the area. No documentation was available to indicate that rinsate sampling of the unit was performed. In September 1984, EPA granted Columbus Products a change in status to a RCRA generator of hazardous waste with less than 90-day storage (USEPA, 1984). OEPA approved the status change in April, 1985 (OEPA, 1985).

OEPA conducted compliance inspections at the facility in 1981, 1982, and 1984. Violations at the facility mainly involved improper labeling of waste containers, lack of complete labeling of waste containers, lack of complete waste analysis and contingency plans, and lack of proper training for employees handling hazardous waste (OEPA, 1981b, 1982b; 1984). Columbus Products satisfactorily corrected all deficiencies that led to the violations (OEPA, 1982a and 1983).

As mentioned in Section 2.2, Consolidated purchased the facility in 1986 and 1989. Currently, Consolidated generates no hazardous waste.

In late 1980, Columbus Products possessed 16 air permits covering paint vapor ventilation systems (Columbus Products, 1980b). No other record of air permits is documented. Consolidated has no air permits.

The facility was first issued an NPDES permit in May 1975 under Westinghouse (OEPA, 1975). The permit was for discharge of water to an outfall (001) to Kinnard Ditch, a drainage route bordering the south end of the facility. Westinghouse was required to monitor for the following parameters:

- Oil and grease
- Hexavalent chromium
- Foaming agents
- Total chromium
- Temperature
- рH
- Flow rate Biological oxygen demand (BOD)

In March 1980, the permit was renewed under Columbus Products for the outfall to Kinnard Ditch (001) and three additional outfalls, 002, 003, and 004 (OEPA, 1980). For outfall 001, monitoring requirements of the 1975 permit remained the same, excluding BOD and foaming agents. Outfall 002 was for nonprocess water exiting the facility to Dry Run, a drainage route on the northern border of the facility. Outfalls 003 and 004 were for stormwater runoff from a coal pile at the northern end of the facility. Outfall 003 discharged to Dry Run, while outfall 004 discharged to an undeveloped area east of the main building. Monitoring requirements for the three added outfalls were as follows:

002

003

004

Total iron

- Oil and grease
- Flow rate

- Total iron
- Total arsenic
- Manganese
- Suspended solids
- pH
- Flow rate

As mentioned in Section 2.4, in 1981, Columbus Products was cited six times for excess oil and grease in outgoing storm water. The releases were to outfall 001, and no documentation is available detailing how the problems were addressed.

In December 1984, Columbus Products filed for a renewal of the NPDES permit, dropping outfall 004 from the application (Columbus Products, 1984). OEPA delayed processing the renewal because of the eliminated outfall. Soon after submitting of the application, Columbus Products eliminated the coal pile from the facility and informed OEPA that the application required further revision. OEPA agreed, and in October 1987, an NPDES permit was approved for outfalls 001 and 002 (OEPA, 1987b). Monitoring requirements for both outfalls were reduced to flow rate, oil and grease, and pH.

In late 1986, OEPA was alerted to oil-contaminated water leaving the facility via the NPDES outfalls. The problem was attributed to water leaving a compressed air blowdown system. In January 1987, the water was rerouted to the sanitary sewer, and the oil discharges ended.

During the sale of the facility in 1989, Columbus Products attempted to transfer the NPDES permit to Consolidated and filed all applicable paperwork. However, Consolidated elected not to accept the transfer because no manufacturing was occurring at the facility (OEPA, 1989a). The transfer was never completed, and in November 1989, OEPA revoked the facility's NPDES permit (OEPA, 1989b).

In April 1986, an underground storage tank (UST) was removed from the area south of the boilerhouse and east of the main building (Columbus Products, 1986). The capacity of the UST or materials of construction were not documented. The UST was part of an emergency dump system for a paint line in the facility. The UST was normally empty and was not used for storage. If contained paint from an emergency dump was reusable, it was returned to the paint line. Columbus Products did not know how long the UST had been used; however, it was not used after 1976.

Before excavation, the contents of the UST were removed by McKesson Envirosystems Company, of Newcastle, Kentucky, for treatment and disposal. Contents of the UST at the time of the removal were not documented. During the removal, solvent odors were noted near the excavated soils. Because of the vapors, in April 1986, OEPA elected to sample the soil from the area. Analysis revealed contamination different from materials that had been in the UST (OEPA, 1986a). Documentation detailing specific contaminants detected and amounts was not available. OEPA performed additional soil sampling in September 1986. Analyses for volatile organic compounds revealed no detectable contamination, and OEPA discontinued investigative action (OEPA, 1986b).

During the VSI, PRC noted a partially buried UST in the area south of the boiler house and east of the main building (AOC 1). Consolidated could supply no information concerning the UST. It consisted of a concrete shell below ground, with a steel covering above ground. PRC could not estimate the capacity of the UST because it was partially full of what appeared to be rainwater.

There is no documentation of CERCLA activity at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The climate in Franklin County is characterized by warm, humid summers and cold, cloudy winters. The yearly average temperature is 52 degrees Fahrenheit (°F). The lowest monthly average temperature is 30°F in January, and the highest monthly average temperature is 75°F in July. Precipitation in central Ohio is fairly well distributed throughout the year. The yearly average rainfall in Franklin County is 36.71 inches. Rainfall peaks in March at 4.17 inches; the lowest monthly rainfall is 2.23 inches in October. The prevailing wind is to the northeast and averages 9 miles per hour throughout the year. The 1-year, 24-hour maximum rainfall average is 2.3 inches, and annual net precipitation is 3.71 inches (USDA, 1980).

2.6.2 Flood Plain and Surface Water

The Consolidated facility does not lie in a flood plain or flood-prone area (FEMA, 1987). The nearest surface water bodies are Kinnard Ditch, which borders the southern edge of the property, and Dry Run, a drainage ditch bordering the northern end. Kinnard Ditch flows northeast to the Scioto River about 2.75 miles from Consolidated. Dry Run flows east and enters Kinnard Ditch about 2 miles from the facility. The Scioto River eventually empties into the Ohio River.

Kinnard Ditch and Dry Run are used mainly for storm water drainage for local industries and businesses. Storm water drainage from the Consolidated facility is to both. The Scioto River is used as the primary drinking water source for western Columbus. The nearest pumping station, the Dublin Road Water Plant, is about 3 miles northeast of the facility. The confluence of the Scioto River and Kinnard Ditch is about 4,000 feet upstream from the water plant.

2.6.3 Geology and Soils

Franklin County lies west of the Red Bedford Delta, a large regional geosyncline running from Tennessee to north-central Ohio. Bedrock in the facility area is Devonian age shale and limestone of the Columbus and Delaware formations and occurs about 90 feet below the ground surface (bgs) (ODNR, 1993). Wisconsinan glacial deposits, composed mainly of silt and clay, overlie the bedrock.

Glacial depositional environments are usually quite unconsolidated. Sediments beneath the facility can generally be divided into the following units in descending order (Burmister, 1951; BBC&M, 1992; ODNR, 1993):

- 0 to 2 feet: Fill consisting of brown and black fine to coarse sand and clays
- 2 to 10 feet: Yellow-brown silt and clay, with some coarse to fine sand
- 10 to 75 feet: Gray silt and clay, with some coarse to fine sand
- 75 to 90 feet: Gray-brown silty clay, with a trace of fine sand
- 91 to 120 feet: Limestone bedrock with interbedded gray shale

Soils in the area are of the Crosby-Kokomo association. These soils are somewhat poorly drained and very poorly drained, formed mainly in medium textured and moderately textured glacial till (USDA, 1980).

2.6.4 Ground Water

The water table in the facility area is about 10 feet bgs (BBC&M, 1992). Ground-water movement is mainly to the northeast towards the Scioto River. Because of the thick clay deposits, glacial deposits in the facility area have limited ground-water resources and are usually of poor quality (PRC, 1993). However, buried river channels in the area can produce from 100 to 500 gpm (Todd, 1983). Bedrock aquifers in the area, developed in limestone formations, yield from 30 to 60 gpm. A number of industrial supply wells have been installed in the limestone formations, and all are screened at about 130 feet bgs. The nearest industrial well is about 300 feet northwest and upgradient of the property (ODNR, 1993). No drinking water wells are located within at least 3 miles of the facility (PRC, 1993).

2.7 RECEPTORS

The Consolidated facility occupies about 268 acres in mixed industrial and small business area of western Columbus, Ohio. Columbus has a population of about 630,000 (USDC, 1991). The facility is bordered to the north by Conrail railroad tracks, to the east by open land and a British Petroleum, Inc. oil refinery, to the south by a series of retail stores and two automobile dealerships, and to the west by a number of small businesses.

The nearest residential area is about 0.75 mile northeast of the facility. The nearest school is about 1 mile east. The facility is completely surrounded by a chain-link fence, excluding the west side of the main building. Consolidated has security personnel on site 24 hours per day, 7 days per week.

The nearest surface water bodies are Kinnard Ditch, which borders the southern edge of the property, and Dry Run, bordering the northern end. Kinnard Ditch flows northeast to the Scioto River about 2.75 miles from Consolidated. Dry Run flows east and enters Kinnard Ditch about 2 miles from the facility. Kinnard Ditch and Dry Run are used mainly for storm water drainage for local industries and businesses. Storm water drainage from the Consolidated facility is to both. About six additional, low volume, drainage routes are within 3 miles of the facility, all of which empty into the Scioto River. The Scioto River supplies drinking water for most of western Columbus. The nearest pumping station, the Dublin Road Water Plant, is about 3 miles northeast of the facility. The confluence of the Scioto River and Kinnard Ditch is about 4,000 feet upstream from the water plant.

Ground water is used only for industrial purposes in the area. The nearest industrial well is about 300 feet northwest and upgradient of the facility. No drinking water wells are located within at least 3 miles of the facility.

There are no sensitive environments within 2 miles of the facility (USGS, 1982).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

SWMU 1

Former SAAs

Unit Description:

Columbus Products used 55-gallon drums, staged on concrete, for satellite accumulation throughout the facility. No designated areas for satellite accumulation were documented, and the location of the areas varied. When full, the drums were transferred to the Former Hazardous Waste Storage Area (SWMU 2) and segregated according to compatibility with other wastes.

Date of Startup:

An exact startup date for the units could not be determined. However, EPA and OEPA files indicate that satellite accumulation in 55-gallon drums always used.

Date of Closure:

Satellite accumulation ended in 1988.

Wastes Managed:

Wastes managed in the units included waste paint materials (F003 and D001); waste paint sludge (D001); waste methylene chloride (F002); waste 1,1,1-trichloroethane (F001); wastewater pretreatment sludge (F006); waste acid solution (D002); and nonhazardous waste oils and hydraulic fluids. Except for waste acid solution (D002), all these wastes were transferred to the Former Hazardous Waste Storage Area (SWMU 2).

Release Controls:

The drums were staged on concrete. Because the SAAs have been removed, PRC could not determine if they had additional release controls.

History of

Documented Releases:

No releases from the SAAs were documented.

Observations:

Because satellite accumulation no longer occurs at the facility, PRC could not assess the SAAs.

SWMU 2

Former Hazardous Waste Storage Area

Unit Description:

The Former Hazardous Waste Storage Area was indoors at the southeast corner of the main building. The unit measured 80 by 240 feet and had a capacity of about 800 55-gallon drums (see Photograph Nos. 1 and 2). It had a concrete base with segregated, bermed storage areas for noncompatible wastes. During the VSI, the concrete appeared to be coated with a sealant; however, Consolidated could not verify this. No floor drains were noted in the vicinity of the unit. When Columbus Products was operating, full waste drums from SAAs throughout the facility were brought to the area and placed in a specified location. The waste materials were usually pumped from the drums into a bulk tanker truck, and the empty drums were removed from the facility by a recycler. Currently, Consolidated uses the area to store wooden pallets, cardboard, and packaged merchandise.

Date of Startup:

An exact startup date for the unit could not be determined. However, EPA and OEPA files indicate that SWMU 2 was the only area ever used for drum storage of hazardous waste.

Date of Closure:

The unit was RCRA-closed in late 1983. After 1983, the unit was used for less than 90-day storage of hazardous waste. The closure was approved by EPA in September 1984 and by OEPA in April 1985.

Wastes Managed:

Wastes managed in the unit included waste paint materials (F003 and D001); waste paint sludge (D001); waste methylene chloride (F002); waste 1,1,1-trichloroethane (F001); wastewater pretreatment sludge (F006); and nonhazardous waste oils and hydraulic fluids. Waste paint materials were taken from the facility to Systech for fuels blending. Waste methylene chloride and waste 1,1,1-trichloroethane were taken to SRR for reclamation. Wastewater pretreatment sludge was taken to Fondessy for treatment and disposal. No documentation is available detailing the disposal of waste oils and hydraulic fluids.

Release Controls:

The area had a concrete floor with segregated, bermed storage areas for noncompatible wastes. During the VSI, the concrete appeared

to be coated with a sealant; however, Consolidated could not verify this.

History of

Documented Releases:

No releases from the unit were documented.

Observations:

The unit is no longer used for waste storage. During the VSI, PRC noted that all berms had been removed. No stains or signs of deteriorating concrete were observed.

SWMU 3

Former Paint Sludge Drying Area

Unit Description:

The Former Paint Sludge Drying Area was outdoors in the central eastern portion of the facility property, and was used by Columbus Products to dewater paint sludge. The unit consisted of a 24- by 24-foot concrete pad surrounded by a concrete berm (Columbus Products, 1980b). Sludge was transported to the unit in drums from SWMU 2, spread across the concrete pad, and allowed to air dry. The sludge was then shoveled back into the drums and transported to an off-site landfill (Columbus Products, 1981).

During the VSI, PRC could not locate this unit. Consolidated had not been informed by Columbus Products that the unit existed. The supposed location of the unit, as listed on the map with the original Part A permit application for Columbus Products and on a map of potential spill sources for the facility, is heavily overgrown with foliage. In the supposed vicinity, PRC noted a few segments of broken concrete; however, a structure could not be identified.

Date of Startup:

There is no documentation detailing when this unit was first used.

Date of Closure:

PRC believes the unit was last used in the early 1980s. It has not been RCRA-closed.

Wastes Managed:

The unit managed waste paint sludge (D001). The materials were allowed to air dry and then removed to an off-site landfill. PRC could not determine if the sludge was treated after it left the facility, or what landfill was used for disposal.

Release Controls:

The unit was constructed of concrete and was surrounded by a concrete berm.

History of Documented Releases:

No releases from this unit have been documented.

Observations:

During the VSI, the unit could not be located. The supposed location of the SWMU was heavily overgrown with foliage and was difficult to traverse during the VSI. In the supposed vicinity of the unit, PRC noted disturbed soils and a few segments of broken concrete; however, a structure could not be identified.

SWMU 4

Former Wastewater Pretreatment Area

Unit Description:

The Former Wastewater Pretreatment Area was located indoors at the southeastern corner of the main building. In 1980, the unit was used for neutralizing waste acid solution and rinsewaters from an electroplating process. The waste acid solution was accumulated in Former SAAs (SWMU 1), transferred to SWMU 4, and slowly added to the system. Rinsewaters from the electroplating process flowed through the system continuously. Wastewater pretreatment consisted of adding a lime and caustic mixture to the pickle liquor solution. The treated wastewater was discharged to the City of Columbus sanitary sewer.

To improve wastewater treatment, the Wastewater Pretreatment Area was upgraded in 1984 and 1985. Columbus Products installed additional tanks and feed lines for a metal hydroxide precipitation system. All wastewater, which flowed at a rate of about 180 gpm during normal operating periods, was neutralized. The system generated wastewater pretreatment sludge (F006) and wastewater. The sludge was placed in 55-gallon drums in Former SAAs (SWMU 1), and eventually transferred to the Former Waste Storage Area (SWMU 2). Columbus Products generated about 11 55-gallon drums of sludge per month, which was taken to Fondessy in Oregon, Ohio for treatment and disposal. Pretreated wastewater was discharged to a City of Columbus POTW.

Date of Startup:

PRC believes that basic neutralization of wastewater at the facility began in the early to mid-1970s. The unit was upgraded in 1984 and 1985.

Date of Closure:

The unit was removed from the facility in 1988.

Wastes Managed:

The unit managed waste acid solution (D002) and rinsewaters from an electroplating process. The unit generated wastewater pretreatment sludge (F006) and pretreated wastewater. Sludge was placed in 55-gallon drums and transferred to SWMU 2. Pretreated wastewater was discharged to the City of Columbus POTW.

Release Controls:

No release controls for the system were documented.

History of

Documented Releases:

No releases from the unit were documented.

Observations:

The unit was removed from the facility in 1988. The concrete floor of the area was free of severe cracks. PRC noted few of what appeared to be chemical stains.

SWMU 5

Waste Oil Storage Area

Unit Description:

The Waste Oil Storage Area is outdoors just east of the center of the main building. The unit lies within the Former Liquid Materials Storage Area (AOC 1). Consolidated uses the area to store 55-gallon drums of nonhazardous waste oils from forklift trucks. The drums are stored on bare ground without release controls. The facility generates about one drum per month of the materials.

Date of Startup:

The area has been used for waste oil storage since 1989.

Date of Closure:

The unit is active.

Wastes Managed:

The unit manages nonhazardous waste oils.

Release Controls:

The unit has no release controls.

History of Documented Releases:

No releases from this unit have been documented.

Observations:

During the VSI, the unit contained about 10 drums. PRC noted no stains; however, stressed vegetation was present near this area.

4.0 AREAS OF CONCERN

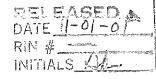
PRC identified one AOC during the PA/VSI. The AOC is discussed below; its location is shown in Figure 2.

AOC 1 Former Liquid Materials Storage Area

The Former Liquid Materials Storage Area is located just east of the main building, south of the boilerhouse and north of a loading ramp. Columbus Products used this area to store various liquid materials in aboveground storage tanks. Materials stored in the area included hydrogen peroxide, compressor oils, and waste oils.

Consolidated currently uses the area to store waste oils from forklift trucks in (SWMU 5) and debris. SWMU 5 has no release controls. During the VSI, PRC observed two stands for former aboveground storage tanks. As mentioned in Section 2.5, PRC identified a UST in this area just south of the boilerhouse (see Photograph No. 3). Consolidated did not know what the tank was used for or its capacity. PRC also noted stressed vegetation in the area but did not observe any stained soil or concrete (see Photograph No. 4).

Documentation from EPA and OEPA files indicates that over the years, this area was a main traffic area for chemical movement in and out of the facility. Because of the former and current use of the area, and the stressed vegetation and UST noted during the VSI, PRC considers the Former Liquid Materials Storage Area an AOC.





5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and one AOC at the Consolidated facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and the AOC. Table 3, at the end of this section, summarizes the SWMUs and the AOC at the facility and the recommended further actions.

SWMU 1

Former SAAs

Conclusions:

The Former SAAs consisted of 55-gallon drums on concrete. The drums were removed from the facility when Columbus Products ended operations. Consolidated does not use satellite accumulation. Because the SAAs are no longer at the facility, the potential for release of hazardous constituents to ground water, surface water, air, and on-site soils is low.

Recommendations:

PRC recommends no further action.

SWMU 2

Former Hazardous Waste Storage Area

Conclusions:

The Former Hazardous Waste Storage Area was RCRA-closed in late 1983. The closure was approved by EPA in 1984 and by OEPA in 1985. Consolidated does not store waste in the unit. During the VSI, PRC noted no stains or severe cracks in the area. Because the unit is no longer used for hazardous waste storage, the potential for release of hazardous constituents to ground water, surface water, air and on-site soils is low.

Recommendations:

PRC recommends no further action.

SWMU 3

Former Paint Sludge Drying Area

Conclusions:

This unit was never RCRA-closed. Its supposed location is heavily overgrown with foliage and was difficult to traverse during the VSI. In the supposed vicinity of the unit, PRC noted disturbed soils and a few segments of broken concrete; however, a structure could not be identified. The potential for release via environmental media is summarized below.



On-Site Soils and Ground Water: Low to moderate. Because of the disturbed soils in the area, PRC believes that the unit may have been buried. If the unit was buried, on-site soils may be contaminated. Because of the shallow water table in the area, ground-water contamination is likely if on-site soils are contaminated.

Surface Water: Low. No surface water bodies are near the supposed location of this unit.

Air: Low. Possible contamination would likely be trapped in soils and ground water.

Recommendations:

PRC recommends that a geophysical survey be performed in the supposed vicinity of this SWMU to determine if it was buried. Once the probable location of the unit is determined, the unit should be RCRA closed. Soil borings with continuous split-spoon sampling should be performed throughout the area to ground water. Soil samples should be analyzed for hazardous constituents. A number of the borings should be converted to ground-water monitoring wells, which should then be sampled and analyzed for hazardous constituents.

SWMU 4

Former Wastewater Pretreatment Area

Conclusions:

This unit was completely removed in 1988 after Columbus Products ended operations at the facility. During the VSI, the concrete floor of the area was free of severe cracks. PRC noted few of what appeared to be chemical stains. Because wastewater pretreatment no longer occurs at the facility, and the unit was removed, the potential for this unit to release hazardous constituents to ground water, surface water, air, and on-site soils is low.

Recommendations:

PRC recommends no further action for this SWMU.

SWMU 5

Waste Oil Storage Area

Conclusions:

The Waste Oil Storage Area, within the Former Liquid Materials Storage Area (AOC 1), has been used since 1989. The unit has no release controls. During the VSI, PRC noted no stains on soils surrounding the drums.



However, stressed vegetation was noted near this area. The potential for release via environmental media is summarized below.

On-Site Soils and Ground Water: Low to moderate. PRC observed no sign of a release in this area. However, because no secondary containment is provided, spills would contaminate on-site soils and possibly ground water.

Surface Water: Low. No surface water bodies are near this unit.

Air: Low. The waste oils have low volatility.

Recommendations:

PRC recommends that Consolidated provide secondary containment for this unit.

AOC 1

Former Liquid Materials Storage Area

Conclusions:

Columbus Products used this area to store various liquid materials in aboveground storage tanks. The SWMU 5 portion of this area is currently used by Consolidated to store waste oils from forklift trucks and debris. During the VSI, PRC observed two stands for former aboveground storage tanks and a UST. PRC also noted stressed vegetation in the area; however, no stained soil or concrete was seen. Documentation from EPA and OEPA files indicates that this area was a main traffic area for chemical movement in and out of the facility. The potential for releases via environmental media is summarized below.

On-site Soils and Ground Water: Low to moderate. Because this area was used for liquid material storage for an extended period of time, and because it was a main traffic area for chemical movement in and out of the facility, a release to on-site soils in this area may have occurred. Because of the shallow water table, releases to on-site soils would likely reach ground water.

Surface Water: Low. No surface water bodies are near this area.

Air: Low. Possible contamination would most likely be trapped in soils or ground water.

Recommendations:

PRC recommends that soil borings with continuous split-spoon soil sampling be performed throughout this area to the ground water. Soil



samples should be analyzed for hazardous constituents. A number of the borings should be converted to ground-water monitoring wells, which should then be sampled and analyzed for hazardous constituents.

Additionally, sludge samples should be taken from the partially buried UST in this area and analyzed for hazardous constituents.



TABLE 3 SWMU AND AOC SUMMARY

	SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1.	Former SAAs	Unknown to 1988	None	None
2.	Former Hazardous Waste Storage Area	Unknown to 1988	None	None
3.	Former Paint Sludge Drying Area	Unknown to early 1980s	None	Perform a geophysical survey in the supposed location. The unit should be RCRA-closed. Perform soil borings in the area. Sample soils and ground water and analyze for
				hazardous constituents.
4.	Former Wastewater Pretreatment Area	Early to mid-1970s to 1988	None	None
5.	Waste Oil Storage Area	1989 to present	None	Provide secondary containment.
	AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1.	Former Liquid Materials Storage Area	Mid-1950s to present	Stressed vegetation in the area.	Perform soil borings in the area. Sample soils and ground water and analyze for hazardous constituents. Sample sludge from UST and analyze for hazardous constituents.
	,			

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ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT

1. IDENTIFICATION											
01 STATE	02 SITE NUMBER										
OH	033005030070										

II. SITE NAME AND LOCATION			- PASSESSEED - PAS		William William Co.						
01 SITE NAME (Legal, common, or descriptive name of sit Consolidated Stores, Inc.	e)	02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER 300 Phillipi Road									
03 CITY Columbus		04 STATE OH	05 ZIP CODE 43228	06 COUNTY Franklin	07 COUNTY CODE 005	08 CONG DIST					
09 COORDINATES: LATITUDE 39°57'30"N	LONGITUDE 83°06'30"W			Will action							
10 DIRECTIONS TO SITE (Starting from nearest public From downtown Columbus, take I-70 west to Road and go to Phillipi Road. Turn left onto I	the Wilson Road exit	Tu r n k lity will t	eft onto Wilson	Road and go	to Fisher Roa	d. Go right on Fisher					
III. RESPONSIBLE PARTIES	HANT				· · · · · · · · · · · · · · · · · · ·						
01 OWNER (if known) Consolidated Stores, Inc.			T <i>(Business, mailin</i> Phillipi Road	g residential)	1000						
03 CITY Columbus		04 STATE OH	05 ZIP CODE 43228	06 TELEPHONE (614) 278							
07 OPERATOR (If known and different from owner)		OB STREE	T (Business, mailin	g, residential)							
09 CITY		10 STATE	11 ZIP CODE	12 TELEPHONE	NUMBER						
F. OTHER	/ Name)	C C. STATE D. COUNTY DE. MUNICIPAL									
(Specify) 14. OWNER/OPERATOR NOTIFICATION ON FILE (Check a B A. RCRA 3010 DATE RECEIVED: 07/29/80 MONTH DAY YEAR	B. UNCONTROLLED	WASTE SIT	E (CERCLA 103 c	DATE RECEIV	ED: / /						
IV. CHARACTERIZATION OF POTENTIAL HAZA	RD										
D NO	that apply) IN B. EPA CONT E. LOCAL HEALTH OFFIC R NAME(S): PRC Environ	IAL	© C. STATE F. OTHER: Management, In	(Spe	o. OTHER CONTRA	ACTOR					
02 SITE STATUS (Check one)	03 YE.	ARS OF OP	RATION								
■ A. ACTIVE DIB. INACTIVE DIC.UNK	AOMN	1954 present UNKNOWN									
O4 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED Consolidated generates nonhazardous waste oils. Under the previous owner, Columbus Products, Inc., hazardous wastes generated included waste paint materials (F003 and D001), waste paint sludge (D001), waste methylene chloride (F002), waste 1,1,1-trichloroethane (F001), wastewater pretreatment sludge (F006), and waste acid solution (D002). The facility also generated wastewater and oils.											
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONM	ENT AND/OR POPULATION										
Potential soil and ground-water contamination	•		·								
V. PRIORITY ASSESSMENT						,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,					
01 PRIORITY FOR INSPECTION (Check one. If high or me	dium is checked, complete I	Part 2 - Was	te Information and	Part 3 - Descrip	tion of Hazardous	Conditions and Incidents.)					
☐ A. HIGH ☐ B. MEDIUM (Inspection required promptly) (Inspection required	D C. LOW		D. NONE		omplete current d						
VI. INFORMATION AVAILABLE FROM	76400		,,		, <u></u>	years					
01 CONTACT Kevin Pierard	02 OF (Agency/Organiza U.S. EPA	tion)			'	03 TELEPHONE NUMBER (312) 886-4448					
04 PERSON RESPONSIBLE FOR ASSESSMENT Pete Zelinskas	05 AGENCY	06 ORG	GANIZATION PRC	07 TELEPHON (513)	E NUMBER 241-0149	08 DATE 01/30/93 month day year					



POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2 - WASTE INFORMATION

I. IDENTIFICATION											
01 STATE	02 SITE NUMBER										
OII	0110006020070										

	Water the second	• • • • • • • • • • • • • • • • • • • •								
II. WASTE S	TATES, QUANTITIES, AND CH	IARACTERI	STICS							
01 PHYSICAL :	STATES (Check all that apply)			QUANTITY AT SITE		3 WASTE CHARACTER	STICS (Check all that apply)			
	D DE. SLURRY DER, FINES F. LIQUID			ures of waste quantities be independent)		A. TOXIC	D H. IGNITABLE			
C. SLU	OGE G. GAS		TON		, .	B. CORROSIVE	I. HIGHLY VOLATILE ZE I J. EXPLOSIVE			
□ D. OTH				7777000		D. PERSISTENT	K. REACTIVE			
	(Specify)		CORIC	YÀRDS		E. SOLUBLE F. INFECTIOUS	L. INCOMPATIBLE M. NOT APPLICABLE			
			NO. O	F DRUMS 10		G. INFLAMMAB	LE			
III. WASTE	'YPE									
CATEGORY	SUBSTANCE NAME	01 GROSS	AMOUNT	02 UNIT OF MEASURE	03 CO	VIMENTS	· · · · · · · · · · · · · · · · · · ·			
SLU	SLUDGE									
OLW	OILY WASTE	5	50	gallons		· · · · · · · · · · · · · · · · · · ·	7-0-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-			
SOL	SOLVENTS					· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·			
PSD	PESTICIDES	1		A CONTRACTOR CONTRACTO	 	·	1000			
осс	OTHER ORGANIC	1	***************************************		-	- Contract				
	CHEMICALS					700				
10 C	INORGANIC CHEMICALS						4			
ACD	ACIDS		To water		-		-			
BAS	BASES					***************************************				
MES	HEAVY METALS									
IV. HAZARD	OUS SUBSTANCES (See Appen	dix for most	frequently c	ited CAS Numbers)	<u>. </u>	· · · · · · · · · · · · · · · · · · ·	WHITE.			
CATEGORY	02 SUBSTANCE NAME	03 CAS N		04 STORAGE/DISPOSAL	METHOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION			
			17.13.4				OF INCHOOLE OF CONCENTRATION			
		<u> </u>								
		 								
			· · · · · · · · · · · · · · · · · · ·							
		<u> </u>					**************************************			
		<u> </u>								
			•							
					-					
					736-2-		<u> </u>			
V. FEEDSTO	CKS (See Appendix for CAS N	lumbaral		<u> </u>		[
CATEGORY	01 FEEDSTOCK NAME	7	NUMBER	CATEGORY	1					
FDS	OT FEEDOTOOK NAME	UZ CAS	NONIDEN	FDS	1 01	FEEDSTOCK NAME	02 CAS NUMBER			
FDS		-			ļ	N-0				
FDS	WW	<u> </u>		FDS						
		 		FDS	<u> </u>					
FDS				FDS						
	S OF INFORMATION (Cite speci			e files, sample analysis, r	eports)					
U.S. EPA R	egion 5, and OEPA - Central	District File	es.							
	•			•						
EPA FORM 20	70-12(17-81)									



POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

 1. IDENTIFICATION

 01 STATE
 02 SITE NUMBER

 OH
 OHD095030979

II.	HAZARDOUS CONDITIONS AND INCIDENTS	Q.o.						
	01 A. GROUNDWATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED: 630,000	02 □ 04	OBSERVED (DATE: NARRATIVE DESCRIPTION)	3	POTENTIAL	O	ALLEGED
	Possible ground-water contamination from past release	ises.						
								·
			PROPERTY AND ADMINISTRATION OF THE PROPERTY AND ADM			· · · · · · · · · · · · · · · · · · ·		
	01 B. SURFACE WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED:	02 (3 04	OBSERVED (DATE:NARRATIVE DESCRIPTION	٠ ـ ـ	2	POTENTIAL	D	ALLEGED
	No hazardous waste is currently generated at the fac-	cility.	·					
	01 D C. CONTAMINATION OF AIR	02 🗖	OBSERVED (DATE:	1		POTENTIAL		ALLEGED
	03 POPULATION POTENTIALLY AFFECTED:	04	NARRATIVE DESCRIPTION	_	_	TOTAL	₩.	ALLEGED
	None							
	· ·							
	01 D. FIRE/EXPLOSIVE CONDITIONS	An ===	ODOED IN A STATE OF THE STATE O			00000	·	
	03 POPULATION POTENTIALLY AFFECTED:	02 G 04	OBSERVED (DATE:		2	POTENTIAL	0	ALLEGED
	None							·
								:
	01 D E. DIRECT CONTACT 03 POPULATION POTENTIALLY AFFECTED:	02 □ 04	OBSERVED (DATE:)	E	POTENTIAL	a	ALLEGED
	The facility is well-secured.							
			•					
				, 	·			-
	01 © F. CONTAMINATION OF SOIL 03 AREA POTENTIALLY AFFECTED: About 150 acres (Acres)	02 🐯 04	OBSERVED (DATE:NARRATIVE DESCRIPTION)	E	POTENTIAL	9	ALLEGED
	Possible soil contamination from past releases.						-	
	•							
	01 D G. DRINKING WATER CONTAMINATION	02 🛱	OBSERVED (DATE:)	0	POTENTIAL		ALLEGED
	03 POPULATION POTENTIALLY AFFECTED:04	NΔ	RRATIVE DESCRIPTION					
	All drinking water in the area is from surface water							
	01 D H. WORKER EXPOSURE/INJURY		OBSERVED (DATE:]	0	POTENTIAL		ALLEGED
	O3 POPULATION POTENTIALLY AFFECTED:	04	NARRATIVE DESCRIPTION					
	None			-				
	01 8 I. POPULATION EXPOSURE/INJURY 03 POPULATION POTENTIALLY AFFECTED: 630,000	02 D 04	OBSERVED (DATE:	j	3	POTENTIAL	0	ALLEGED
	See above descriptions.							
ED	A EODAR 2070 12117 011							



POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICA	TION
01 STATE	02 SITE NUMBER
OH	OHD095030970

		.,		V-Coloria				
II. HAZA	RDOUS CONDITIONS AND INCIDENTS (Contin	nued)						
01 🖼 04	J. DAMAGE TO FLORA NARRATIVE DESCRIPTION	02 🗖	OBSERVED (DATE:11/03/92	_)	0	POTENTIAL		ALLEGED
Stress	ed vegetation was noted at AOC 1.							
	•					,		-
01 🗖	K. DAMAGE TO FAUNA	'02 FI	OBSERVED (DATE:					
04	NARRATIVE DESCRIPTION	02 🚨	OBSERVED (DATE:	/	u	POTENTIAL		ALLEGED
None	observed.							
01 □ 04	L. CONTAMINATION OF FOOD CHAIN	02 🗖	OBSERVED (DATE:)	0	POTENTIAL	0	ALLEGED
04	NARRATIVE DESCRIPTION		4					•
None	observed.							
01 🛭 03	M. UNSTABLE CONTAINMENT OF WASTES POPULATION POTENTIALLY AFFECTED:	02 🗖 04	OBSERVED (DATE:11/03/92 NARRATIVE DESCRIPTION		0	POTENTIAL	22	ALLEGED
No se	condary containment is provided for nonhazar	dous w	aste oils.					•
	•							
		1						
01 □ 04	N. DAMAGE TO OFF-SITE PROPERTY NARRATIVE DESCRIPTION	02 🗖	OBSERVED (DATE:)	0	POTENTIAL	0	ALLEGED
None	observed.							
							-	
01 ロ 04	O. CONTAMINATION OF SEWERS, DRAINS, WWTPS NARRATIVE DESCRIPTION	02	OBSERVED (DATE:)		POTENTIAL	D	ALLEGED
None	observed.							
01 ロ 04	P. ILLEGAL/UNAUTHORIZED DUMPING NARRATIVE DESCRIPTION	02 🗖	OBSERVED (DATE:)	0	POTENTIAL	D	ALLEGED
None	observed.							
None	ouserved.			1				
05	DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, O	RAIIEC	FD HAZARDS					
None	S. S. S. S. S. S. S. S. S. S. S. S. S. S	···						
	AL POPULATION POTENTIALLY AFFECTED:63							
IV. COM		u,uuu				- David - OWNE		
None			- Company of the Comp	*****				
						·		-
	RCES OF INFORMATION (Cite specific reference							,
See P	art 2, Section VI. Ohio Department of Natura	l Reso	urces, U.S. Department of	Agricultu	re.			
EPA FORM	1 2070-12(17-81)							

ATTACHMENT B
VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Consolidated Stores, Inc. 300 Phillipi Road Columbus, Ohio 43228 OHD 095 030 979

Date:

November 3, 1992

Primary Facility Representative: Representative Telephone No.:

Mr. Albert Bell, Senior Vice President

No.: (614) 278-6762

Additional Facility Representatives:

Mr. Todd Noethen, Engineer

Inspection Team:

Peter Zelinskas, PRC Environmental Management, Inc. Chris Cappel, PRC Environmental Management, Inc.

Photographer:

Chris Cappel

Weather Conditions:

Sunny, cool, with temperatures between 50° and 55°F

Summary of Activities:

The visual site inspection (VSI) began at 10:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed current facility operations; however, they had no information concerning Columbus Product's operations. The facility representatives agreed to provide PRC with a report on test borings of the subsurface in the area, recently performed by BBC&M Engineering, Inc., at a portion of the facility.

The VSI tour began at 11:00 a.m. PRC was walked through the interior of the main building and then along its exterior. PRC was then left alone to walk about the undeveloped areas of the facility, including the interior of the shipping/receiving building. Because all manufacturing equipment was removed when Consolidated purchased the facility, most SWMUs were no longer present. PRC was unable to locate the Former Paint Sludge Drying Area (SWMU 3).

The tour concluded at 1:45 p.m., after which the inspection team held an exit meeting with facility representatives. The VSI was completed and the inspection team left the facility at 2:00 p.m.



Photograph No. 1 Orientation: South Description: The Former Hazardous Waste Storage Area.

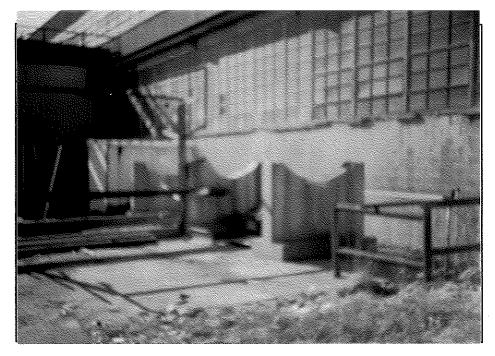
Location: SWMU 2 Date: 11/03/92



Photograph No. 2 Orientation: North

Description: The Former Hazardous Waste Storage Area.

Location: SWMU 2 Date: 11/03/92



Photograph No. 3 Orientation: Southwest Location: AOC 1 Date: 11/03/92

Description: A location of a former aboveground storage tank in the Former Liquid Materials Storage Area.



Photograph No. 4 Orientation: Northwest

Description: The UST in the Former Liquid Materials Storage Area.

Location: AOC 1 Date: 11/03/92 ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES

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(Now odd Lats)
Side Condidition At Bell
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	Halked in 1974. Usakur	Whain in this area	250,000 gallen werestent		of Transformers - No visible	Their ning.	A bermen ceal stronger area	Used now test brailer	Darktog.	A CONTRACTOR OF CONTRACTOR	A DIARCANCE AND THE	Coord Sield. No signos	of acceptary yer.	to Mating an eitert	to locable paint	Thodge amore.	Letter & Language 11-3:43

1345 Clesing discussion with Corporated Jours 17 pest 80 ys have not supported US with much intornation. Ce 4 Ph Returning to main their by